

TSD File Inventory Index

Date: March 20, 2001

Initial: CMG/mwp

Facility Name: <u>Better Corporation of America (see folder title)</u>		
Facility Identification Number: <u>CHD 000 821 470</u>		
A.1 General Correspondence	✓	B.2 Permit Docket (B.1.2)
A.2 Part A / Interim Status	✓	.1 Correspondence
.1 Correspondence	✓	.2 All Other Permitting Documents (Not Part of the ARA)
.2 Notification and Acknowledgment	✓	C.1 Compliance - (Inspection Reports)
.3 Part A Application and Amendments	✓	C.2 Compliance/Enforcement
.4 Financial Insurance (Sudden, Non Sudden)	✓	.1 Land Disposal Restriction Notifications
.5 Change Under Interim Status Requests	✓	.2 Import/Export Notifications
.6 Annual and Biennial Reports	✓	C.3 FOIA Exemptions - Non-Releasable Documents
A.3 Groundwater Monitoring	✓	D.1 Corrective Action/Facility Assessment
.1 Correspondence	✓	.1 RFA Correspondence
.2 Reports	✓	.2 Background Reports, Supporting Docs and Studies
A.4 Closure/Post Closure	✓	.3 State Prelim. Investigation Memos
.1 Correspondence	✓	.4 RFA Reports
.2 Closure/Post Closure Plans, Certificates, etc	✓	D. 2 Corrective Action/Facility Investigation
A.5 Ambient Air Monitoring	✓	.1 RFI Correspondence
.1 Correspondence	✓	.2 RFI Workplan
.2 Reports	✓	.3 RFI Program Reports, and Oversight
B.1 Administrative Record	✓	.4 RFI Draft /Final Report

Total - 1

.5 RFI QAPP		.7 Lab data, Soil Sampling/Groundwater	
.6 RFI QAPP Correspondence		.8 Progress Reports	
.7 Lab Data, Soil-Sampling/Groundwater		D.5 Corrective Action/Enforcement	
.8 RFI Progress Reports		.1 Administrative Record 3008(h) Order	
.9 Interim Measures Correspondence		.2 Other Non-AR Documents	
.10 Interim Measures Workplan and Reports		D.6 Environmental Indicator Determinations	
D.3 Corrective Action/Remediation Study		.1 Forms/Checklists	
.1 CMS Correspondence		E. Boilers and Industrial Furnaces (BIF)	
.2 Interim Measures		.1 Correspondence	
.3 CMS Workplan		.2 Reports	
.4 CMS Draft/Final Report		F Imagery/Special Studies (Videos, photos, disks, maps, blueprints, drawings, and other special materials.)	
.5 Stabilization		G.1 Risk Assessment	
.6 CMS Progress Reports		.1 Human/Ecological Assessment	
.7 Lab Data, Soil-Sampling/Groundwater		.2 Compliance and Enforcement	
D.4 Corrective Action Remediation Implementation		.3 Enforcement Confidential	
.1 CMI Correspondence		.4 Ecological - Administrative Record	
.2 CMI Workplan		.5 Permitting	
.3 CMI Program Reports and Oversight		.6 Corrective Action Remediation Study	
.4 CMI Draft/Final Reports		.7 Corrective Action/Remediation Implementation	
.5 CMI QAPP		.8 Endangered Species Act	
.6 CMI Correspondence		.9 Environmental Justice	

Note: Transmittal Letter to Be Included with Reports.

Comments: Documents do not just fit individual folder as scheduled.

**A.1 Public
Participation**

PUBLIC NOTICE

Cuyahoga County

Change in Status of Hazardous Waste Facility

For: Union Carbide Corporation, US EPA ID No.: OHD000821470, 11901 Madison Avenue, Cleveland, Ohio. The Ohio Environmental Protection Agency (Ohio EPA) is hereby giving notice of the change in status for the above referenced facility. This facility has stored hazardous waste (as defined by Ohio law) in containers or tanks. The change in status has been effected by removing the hazardous waste stored longer than 90 days and by limiting the present accumulation time to fewer than 90 days. This action has changed the facility's status to that of a generator storing fewer than 90 days. Ohio EPA is also giving notice that this facility is subject to a determination concerning corrective action, a requirement under the Hazardous and Solid Waste Amendments of 1984, which concerns any possible uncorrected releases of hazardous waste or hazardous constituents to the environment from any current or previous solid waste management units at the above facility. A corrective action determination is required from hazardous waste facilities requesting a change in status.

Factual information concerning any releases of hazardous waste or hazardous waste constituents by the above facility requiring corrective action should be submitted within 30 days of this notice to: Ohio Environmental Protection Agency, Div. of Solid & Hazardous Waste Mgmt., Attn: Data Management Section, Box 1049, 361 E. Broad Street, Columbus, Ohio 43216-1049.

RECEIVED
JUN 3 1988

OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION V

RECEIVED

JUN 3 1988

WMD-DIV-RCRA
EPA, REGION V

PN week of 7/27/86

Elmer Main Reader

file copy

**A.2 Part A/
Interim Status**



UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION 5
RCRA ACTIVITIES
P.O. BOX A3587
CHICAGO, ILLINOIS 60690

2-10-89

Phil Costanzo
Getters Corp of America
11901 Madison Ave
Cleveland, Oh. 44107

RE: EPA ID #: OH0000821470

In response to your request of 2-9-89 the following information
has been updated:

We are inactivating the above EPA ID number.
We are in the process of issuing you a
number for the new facility (5604 Valley
Belt Rd).

If you have questions, please contact Sharon Kiddon at (312)886-6173.

Sincerely,

Arthur S. Kawatachi
Information Section
RCRA Program Management Branch

cc: State Agency
File -



UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF:
RCRA ACTIVITIES

JUL 29 1983

Phillip Costanzo, Eng. Mgr.
Union Carbide Corp., Electronics Div.
P. O. Box 6087
Cleveland, Ohio 44101

RE: Interim Status Acknowledgement USEPA ID No. OHD000B21470
FACILITY NAME: Union Carbide Corp., Electronics Div.

Dear Mr. Costanzo:

This is to acknowledge that the U.S. Environmental Protection Agency (USEPA) has completed processing your Part A Hazardous Waste Permit Application. It is the opinion of this office that the information submitted is complete and that you, as an owner or operator of a hazardous waste management facility, have met the requirements of Section 3005(e) of the Resource Conservation and Recovery Act (RCRA) for Interim Status. However, should USEPA obtain information which indicates that your application was incomplete or inaccurate, you may be requested to provide further documentation of your claim for Interim Status. Our opinion will be reevaluated on the basis of this information.

As an owner or operator of a hazardous waste management facility, you are required to comply with the interim status standards as prescribed in 40 CFR Parts 122 and 265, or with State rules and regulations in those States which have been authorized under Section 3006 of RCRA. In addition, you are reminded that operating under interim status does not relieve you from the need to comply with all applicable State and local requirements.

The printout enclosed with this letter identifies the limit(s) of the process design capacities your facility may use during the interim status period. This information was obtained from your Part A Permit application. If you wish to handle new wastes, to change processes, to increase the design capacity of existing processes, or to change ownership or operational control of the facility, you may do so only as provided in 40 CFR Sections 122.22 and 122.23.

As stated in the first paragraph of this letter, you have met the requirements of 40 CFR Part 122.23; your facility may operate under interim status until such time as a permit is issued or denied. This will be preceded by a request from this office or the State (if authorized) for Part B of your application. Please contact Arthur Kawatachi of my staff at (312) 836-7449, if you have any questions concerning this letter or the enclosure.

Sincerely,


Karl J. Klepitsch, Jr., Chief
Waste Management Branch

Enclosure
cc: D.E. MacIntyre, Jr. Pres. & Gen. Mgr.



WASTE MINIMIZATION ADDENDUM TO GENERATOR BIENNIAL OR
ANNUAL HAZARDOUS WASTE REPORT FOR 1985

THIS REPORT IS FOR THE CALENDAR YEAR ENDING DECEMBER 31, 1985.

The Hazardous and Solid Waste Amendments of 1984 require all generators of hazardous waste to submit the following information to the United States Environmental Protection Agency or a State authorized to collect such information:

GENERATOR's EPA I.D. No. 01H1010181214701

GENERATOR NAME: Union Carbide Corporation, Electronics Division

GENERATOR ADDRESS: 11901 Madison Avenue, P.O. Box 6087

Lakewood, Ohio 44107

WASTE MINIMIZATION

Describe in the space below your efforts, undertaken during calendar year 1985, to reduce the volume and toxicity of the hazardous waste which your business generates. Also describe changes in waste volume and toxicity actually achieved during 1985 in comparison to previous years, to the extent possible.

Ohio EPA has recognized this facility as a small generator. Consequently, although we have not been required to do so, we now sell barium aluminate and barium metal oxide (originally listed as EPA hazard waste No. D005) to Barium & Chemicals, Inc. Please see attached.

CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

PRINT/TYPE NAME

W. A. Bagot

TITLE

Vice President
Electronics Div.
Union Carbide Corporation

SIGNATURE

DATE SIGNED

2/21/86



**GETTERS
CORPORATION
OF AMERICA**

5604 Valley Belt Road
Cleveland, Ohio 44131
Telephone (216) 661-8488
TWX (810) 421-8314
Telefax (216) 661-8796

February 7, 1989

RECEIVED
FEB 9 1989

OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION V

Ms. Francine Norling
U.S. EPA
Region 5
230 South Dearborn Street
Chicago, Illinois 60604

Re: Request For New EPA ID No.

Dear Ms. Norling,

Enclosed please find application for a new EPA I.D. number. As your records will indicate we were formerly a business owned by Union Carbide Corporation until September 1, 1987.

We have completed our facility relocation to a new site (January 13, 1989). Consequently, it is my understanding that we must apply for a new I.D. number. We continue to be a small quantity generator of hazardous waste. If I can be of any further assistance please do not hesitate to call me.

Sincerely,

Phillip A. Costanzo
Engineering Manager

/ch

cc: T. H. Madden, GCA
Ms. Debra J. Berg,
District Inspector
Ohio EPA



**GETTERS
CORPORATION
OF AMERICA**

11901 Madison Ave.
Cleveland, Ohio 44107
Telephone (216) 529-3860
TWX (810) 421-8314
Telefax (216) 529-3861

May 17, 1988

Ms. Francine Norling
US EPA
Region 5
230 South Dearborn St.
Chicago, Illinois 60604

RE: Withdrawal of Part A Application

Dear Ms. Norling:

As per our conversation of May 16, 1988, I am sending you some information regarding a withdrawal of part A application. As stated previously, Getters Corporation of America is a new company with no affiliation with Union Carbide whatsoever. The sale of our company took place on September 1, 1987. Since then, we have continued to operate a small manufacturing plant with an average of 80 employees. Getters Corporation of America is a small quantity generator that does not treat hazardous waste of any kind or store hazardous waste on site for more than 90 days. It is our understanding that we are not required to have a RCRA permit to store hazardous waste.

Please view the enclosed copies of correspondence with both the Ohio EPA and US EPA. You will find several letters requesting a withdrawal of part A application for hazardous waste permit.

After viewing these letters and the Union Carbide - Electronics Division file and due to Union Carbide's ownership of this operation at the time, you should agree that Getters Corporation of America is not responsible for any closure procedures that may be required.

Please feel free to contact me if you need additional information. Ms. Debbie Berg of the Ohio EPA, Twinsburg office, has also suggested that you call her for any information you need as well.

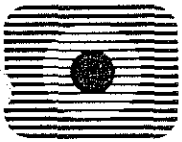
Sincerely,

Denise M. Haderski

Denise M. Haderski
Health & Safety Co-ordinator
for Getters Corporation of America
(216) 529-3799

cc: Ms. Debra J. Berg
District Inspector
Ohio EPA
(216) 425-9171

Enclosures



**GETTERS
CORPORATION
OF AMERICA**

11901 Madison Ave.
Cleveland, Ohio 44107
Telephone (216) 529-3860
TWX (810) 421-8314
Telefax (216) 529-3861

January 18, 1988

US EPA
Region V
P.O. Box 3587
Chicago, IL 60690

Dear Sir or Madame:

Our company was previously owned by Union Carbide Corporation. As of September 1, 1987 we were sold. We are now Getters Corporation of America. Nothing has changed except for ownership and Installation name. Our location is the same and we are still a small quantity generator.

Please update your records so that our EPA ID # is recognizable under the new corporation name. The following information will be needed for updating the records:

EPA ID # OHD 000821470
Old Name - Union Carbide Corporation
Electronics Division

New Name - Getters Corporation of America
Installation Address- 11901 Madison Avenue
Lakewood, Ohio 44107

Sometime this year, Getters Corporation of America will be moved to a new facility. It is understood that at that time a notification of hazardous waste activity application must be filled out in which a new ID number will be issued for the new site.

I hope this information is adequate. If you need more, please contact me.

Thank you,

Denise M. Haderski

Denise M. Haderski
Safety & Health Co-Ordinator



UNION CARBIDE CORPORATION
CARBON PRODUCTS DIVISION

11901 MADISON AVENUE, CLEVELAND, OHIO 44107
• TELEPHONE: 216-226-2624

ADDRESS REPLY TO:
P.O. BOX 6067
CLEVELAND, OHIO 44101

August 31, 1987

Ms. Deborah J. Berg
Ohio EPA District Inspector
Division of Solid and Hazardous
Waste Management
Northeast District Office
2110 East Aurora Road
Twinsburg, Ohio 44087

Dear Ms. Berg:

This letter is hereby submitted to advise you of the impending sale of the "KEMET" business of Union Carbide Corporation which is shown on your records as Union Carbide Corporation, Electronics Division, located at Madison Avenue in Lakewood, Ohio 44107. The mailing address is P. O. Box 6087, Cleveland, Ohio 44101. This facility is a RCRA small quantity generator registered under EPA ID number OHD 000 821 470. We understand the facility may continue to operate under the current EPA ID number pending the completion of the transfer of proceedings.

This business will be sold to the Getters Corporation of America, 11901 Madison Avenue, Lakewood, Ohio 44107. Please process this change/transfer in your records and advise us of any further requirements on our behalf.

Yours truly,

A handwritten signature in cursive script, appearing to read "Phillip A. Costanzo".

Phillip A. Costanzo
Engineering Manager
Union Carbide Corporation
Kemet Getter Products

/ch

cc: S. Heinz
N. Hillson
T. Madden
R. Tish



N/A

UNION CARBIDE CORPORATION 11901 MADISON AVENUE, CLEVELAND, OH 44101
ELECTRONICS DIVISION TELEPHONE: 226-2824, AREA CODE: 216 • TWX: 810-421-8314

ADDRESS REPLY TO: P.O. BOX 6087, CLEVELAND, OHIO 44101

February 13, 1986

RCRA Activities
Region V
P. O. Box A3587
Chicago, IL 60690
Attention: ATKJG

Subject: Hazardous Waste
Permit Application
U.S. EPA ID #OHD
00821470

Dear Sir or Madam:

We have been recognized by the Ohio EPA, Northeast District Office as a small quantity generator. Please see attached correspondence. Consequently, we are requesting that our Part "A" Hazardous Waste Permit application be withdrawn and returned as soon as possible.

Sincerely,

A handwritten signature in blue ink, appearing to read "W. A. Bagot".

W. A. Bagot
Vice President

/ch
att.



State Of Ohio Environmental Protection Agency

Northeast District Office
2110 E. Aurora Road; Twinsburg, Ohio 44087-1969

(216) 425-9171

RECEIVED
JAN 6 1986



Richard F. Celeste, Governor

January 2, 1986

Re: Union Carbide Corporation
Electronics Division
OHD 000 821 470
Cuyahoga County

Phillip A. Costanzo, Engineering Manager
Union Carbide Corporation
Electronics Division - Components Department
P.O. Box 6087
Cleveland, Ohio 44101

Dear Mr. Costanzo:

I have reviewed your letter of November 22, 1985 and have determined that your statements contained within are correct.

I have enclosed for your information a pamphlet which describes the current RCRA requirements for 100 - 1000 kg/month small quantity generators. Greater than (>) 1000 kg/month generators are expected to comply with the following rules, as you know: OAC Chapters 3745-51 and -52, and the applicable sections of OAC Chapters 3745-55, -65 and -66 as referenced in OAC 3745-52-34.

Thank you for your inquiry. If further questions develop, please do not hesitate to call.

Sincerely,

Deborah J. Berg
District Inspector
Division of Solid and Hazardous Waste Management

DJB:kr

Enclosure

RECEIVED

JAN 6 1986



UNION CARBIDE CORPORATION 11901 MADISON AVENUE, CLEVELAND, OH 44101
ELECTRONICS DIVISION TELEPHONE: 226-2824, AREA CODE: 216 • TWX: 810-421 8314

ADDRESS REPLY TO: P.O. BOX 6087, CLEVELAND, OHIO 44101

November 22, 1985

Ms. Deborah I. Berg
Ohio EPA District Inspector
Division of Solid & Hazardous
Waste Management
Northeast District Office
2110 E. Aurora Road
Twinsburg, Ohio 44087

Dear Ms. Berg:

Pursuant to our conversation today, November 22, 1985, it is my understanding that there is no formal "small generator status" stamp or certificate that is issued to generators of hazardous waste under the 1000 kg./mo. category. You mentioned that you have received our "Request For Change in Status" form signed by D. E. Maguire, V.P., dated 3/19/85 and noted in your files.

You also mentioned that you expect us to conform to the regulations of small generator when our waste level is in that (small) quantity category and if we exceed the 1000 kg./mo. category we are expected to conform to the generator regulations as applied for originally in Part A of our RCRA application.

It is also my understanding that an annual generators report is not required to be filed in the small generator class.

For our records, please confirm, in writing, that the above statements were interpreted correctly by myself in our conversation.

As in the past, thank you for your cooperation.

Sincerely,

A handwritten signature in cursive script, reading "Phillip A. Costanzo".

Phillip A. Costanzo
Engineering Manager
Electronics Division
Components Department

/ch

cc: T. H. Madden
G. R. DeHollander
R. E. Neel
Wilbur E. McKnight
Kathy Homer

SEP 16 1988

Denise M. Haderski
Health and Safety Co-ordinator
Getters Corporation of America
11901 Madison Ave.
Cleveland, Ohio 44107

Re: Request for Change in RCRA Status
Getters Corporation of America
OHD 000 821 470

Dear Ms. Haderski:

This is to advise you that your May 17, 1988, request for a change in status under the Resource Conservation and Recovery Act (RCRA) has been approved. For purposes of RCRA, you are now considered a "generator of hazardous waste". As a generator, you are subject to the regulations contained in 40 CFR Part 262, and any other applicable regulations referenced therein. Your facility is no longer considered a treatment, storage, or disposal (TSD) facility which would require a RCRA Part B permit to operate.

Should you decide to initiate storage of hazardous waste generated on-site for longer than the accumulation times allowed in 40 CFR §262.34, or to initiate on-site treatment or disposal of hazardous waste, you must contact our office or the Ohio Environmental Protection Agency (OEPA) at least 10-days prior to such initiation. Based on the specifics of the proposed changes, we will advise you whether actual issuance of a permit is a prerequisite for such changes, or whether resubmittal of a Part A application is sufficient. Failure to contact either office as mentioned above would subject you to enforcement penalties.

Please be advised that under 40 CFR §270.72(d), all interim status duties are transferred to the new owner of a facility upon the change of ownership or operational control of the facility. Therefore, approval of this action does not release Getters Corporation of America from any responsibilities as required under the Hazardous and Solid Waste Amendments of 1984, regarding

-2-

corrective action from all releases of hazardous waste or constituents from any solid waste management units, regardless of the time at which waste was placed in such units.

If you have any questions, please contact Ms. Francine Morling of my staff, at (312) 886-6198, for assistance.

Sincerely,

ORIGINAL SIGNED BY/

KARL E. BREMER

Karl E. Bremer, Chief
RCRA Permitting Branch

cc: Ed Lim, OEPA
Randy Meyer, OEPA
Debbie Berg, OEPA-NEDO

5HR:NORLING:bd:9/13/88

Disk #6

20
9-15-88

RCRA PERMITS	TYP.	AUTH.	IL. CHIEF	IN. CHIEF	MI. CHIEF	MN/WI CHIEF	OH. CHIEF	RPB CHIEF	O.R. A.D.D.	WMD DIR
INIT. DATE	9/14/88	J.P.N. 9/14/88					9/14/88	9/14/88		



**GETTERS
CORPORATION
OF AMERICA**

11901 Madison Ave.
Cleveland, Ohio 44107
Telephone (216) 529-3860
TWX (810) 421-8314
Telefax (216) 529-3861

January 18, 1988

US EPA
Region V
P.O. Box 3587
Chicago, IL 60690

Dear Sir or Madame:

Our company was previously owned by Union Carbide Corporation. As of September 1, 1987 we were sold. We are now Getters Corporation of America. Nothing has changed except for ownership and Installation name. Our location is the same and we are still a small quantity generator.

Please update your records so that our EPA ID # is recognizable under the new corporation name. The following information will be needed for updating the records:

EPA ID # OHD 000821470 *G, TDS, PA*
Old Name - Union Carbide Corporation
Electronics Division

New Name - Getters Corporation of America
Installation Address- 11901 Madison Avenue
Lakewood, Ohio 44107

Sometime this year, Getters Corporation of America will be moved to a new facility. It is understood that at that time a notification of hazardous waste activity application must be filled out in which a new ID number will be issued for the new site.

I hope this information is adequate. If you need more, please contact me.

Thank you,

Denise M. Haderski

Denise M. Haderski
Safety & Health Co-Ordinator

RECEIVED

JAN 22 1988

SWD - RLB
U.S. EPA. REGION V

sjd



INTERNAL
CORRESPONDENCE

RECEIVED

FEB 21 1986

W. A. BAGOT

UNION CARBIDE CORPORATION
ELECTRONICS DIVISION

11901 MADISON AVENUE, P.O. BOX 6087
CLEVELAND, OHIO 44101

To (Name) W. A. Bagot
Division Electronics
Location Danbury, CT
Area

Date February 13, 1986

Originating Dept. COMPONENTS

Area

Copy to P. A. Costanzo
R. DeHollander
H. D. Smilie

Subject EPA Required Documents

P. Costanzo and R. DeHollander (Electronics Division Environmental Coordinator - Greenville) advise that the Waste Minimization Addendum (attached) should be signed by you as Division Vice President. Similar documents in the past were signed by D. E. Maguire. Also, we are enclosing our letter requesting withdrawal from Part A Hazardous Waste Permit which no longer applies since we are now selling barium furnace by-products to Barium & Chemicals Company (copies of purchase orders are enclosed).

After signing both documents, please send copies of documents and enclosures to me for our files. Originals with attachments should be sent on to:

RCRA Activities
Region V
P. O. Box A3587
Chicago, IL 60690
Attention: ATKJG

via certified mail, receipt requested. Mail form is enclosed in addressed envelope.

T. H. Madden

/ch
att.



UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V
111 West Jackson Blvd.
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF:

RCRA ACTIVITIES

19 AUG 1982

Mr. Philip A. Costanzo, Engineering Manager
Union Carbide Corporation, Electronic Division
P. O. Box 6087
Cleveland, Ohio 44101

RE: Permit Application Withdrawal Letter
FACILITY: Union Carbide Corporation (Electronics Division)
USEPA ID NO.: OHD 000 821 470

Dear Mr. Costanzo:

This is to acknowledge receipt of your letter of April 6, 1981, requesting the withdrawal of your Part A Hazardous Waste Permit Application. Your request was not signed and certified by an authorized person, in accordance with 40 CFR Part 122.6 (enclosed). Please resubmit your request with the correct signature and certification, so that your withdrawal can be processed. Your request must contain a detailed explanation why the application should be withdrawn. Also, if at any time, since November 19, 1980, your operation included treatment, storage, or disposal of hazardous waste subject to 40 CFR Part 265, a closure plan must be filed with the withdrawal request. Requirements for closure are found in 40 CFR Part 265 Subpart G (enclosed).

Please feel free to contact the Technical, Permits, and Compliance Section at (312) 353-2197 for assistance if you have any questions. Please refer to "Permit Application Withdrawal Letter," in all correspondence on this matter.

Sincerely yours,

Karl J. Klepitsch, Jr., Chief
Waste Management Branch

Enclosures

cc: Mr. D. E. Maguire, Vice President

Handwritten initials/signature in bottom right corner.

FORM 1 GENERAL		EPA		ENVIRONMENTAL PROTECTION AGENCY GENERAL INFORMATION Consolidated Permits Program (Read the "General Instructions" before starting.)		I. EPA I.D. NUMBER F 04 D 0 0 0 8 2 1 4 7 0 2 D	
II. POLLUTANT CHARACTERISTICS		III. FACILITY NAME		IV. FACILITY MAILING ADDRESS		V. FACILITY LOCATION	
INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms.		PLEASE PLACE LABEL IN THIS SPACE		GENERAL INSTRUCTIONS If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill-in area below. Also, if any of the preprinted data is absent (the area to the left of the label space lists the information that should appear), please provide it in the proper fill-in area(s) below. If the label is complete and correct, you need not complete items I, III, V, and VI (except VI-B which must be completed regardless). Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.			

SPECIFIC QUESTIONS	MARK 'X'		
	YES	NO	FORM ATTACHED
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)		X	
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)		X	
E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)	X		X
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X	
I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	
B. Does or will this facility (either existing or proposed) include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)		X	
D. Is this a proposed facility (other than those described in A or B above) which will result in a discharge to waters of the U.S.? (FORM 2D)		X	
F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	

III. NAME OF FACILITY	
1	UNION CARBIDE CORP. ELECTRONICS DIV.

IV. FACILITY CONTACT	
A. NAME & TITLE (last, first, & title)	
2	COSTANZO, PHILLIP, ENG. MGR.
B. PHONE (area code & no.)	
2	216 226 2824

V. FACILITY MAILING ADDRESS	
A. STREET OR P.O. BOX	
3	PO. BOX 6087
B. CITY OR TOWN	
4	CLEVELAND
C. STATE	
OH	
D. ZIP CODE	
44101	

VI. FACILITY LOCATION	
A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER	
5	11901 MADISON AVE
B. COUNTY NAME	
CUYAHOGA	
C. CITY OR TOWN	
6	LAKEWOOD
D. STATE	
OH	
E. ZIP CODE	
44101	
F. COUNTY CODE (if known)	
03	

VII. SIC CODES (4-digit, in order of priority)

A. FIRST				B. SECOND								
7	3	6	7	9	(specify)	Electronic Components	7	(specify)				
15	16	17	18	19	Not Elsewhere Classified			15	16	17	18	19
C. THIRD				D. FOURTH								
7	2	8	1	9	(specify)	Inorganic Industrial	7	(specify)				
15	16	17	18	19	Compounds Not Else Mentioned			15	16	17	18	19

VIII. OPERATOR INFORMATION

A. NAME												B. Is the name listed in Item VIII-A also the owner?	
8	UNION CARBIDE CORPORATION											<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO
15	16	17	18	19								20	21
C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)										D. PHONE (area code & no.)			
F = FEDERAL		M = PUBLIC (other than federal or state)		(specify)						C			
S = STATE		O = OTHER (specify)								A			
P = PRIVATE										15			
										2		1	
										6		2	
										2		8	
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										427		428	
										429		430	
										431		432	

FORM 3 RCRA	EPA	U.S. ENVIRONMENTAL PROTECTION AGENCY HAZARDOUS WASTE PERMIT APPLICATION Consolidated Permits Program (This information is required under Section 3005 of RCRA.)
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I. EPA I.D. NUMBER													
S	1	2	3	4	5	6	7	8	9	T/A/C			
F	0	H	D	0	0	0	8	2	1	4	7	3	1

FOR OFFICIAL USE ONLY

APPLICATION APPROVED	DATE RECEIVED (yr., mo., & day)	COMMENTS

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below (mark one box only) to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION (place an "X" below and provide the appropriate date)

☐ 1. EXISTING FACILITY (See instructions for definition of "existing" facility. Complete item below.)

☐ 2. NEW FACILITY (Complete item below.)

FOR EXISTING FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED (use the boxes to the left)

FOR NEW FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR IS EXPECTED TO BEGIN

B. REVISED APPLICATION (place an "X" below and complete Item I above)

☒ 1. FACILITY HAS INTERIM STATUS

☐ 2. FACILITY HAS A RCRA PERMIT

III. PROCESSES - CODES AND DESIGN CAPACITIES

A. PROCESS CODE - Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process (including its design capacity) in the space provided on the form (Item III-C).

B. PROCESS DESIGN CAPACITY - For each code entered in column A enter the capacity of the process.

1. AMOUNT - Enter the amount.

2. UNIT OF MEASURE - For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PRO- CESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY	PROCESS	PRO- CESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:			Treatment:		
CONTAINER (barrel, drum, etc.)	S01	GALLONS OR LITERS	TANK	T01	GALLONS PER DAY OR LITERS PER DAY
TANK	S02	GALLONS OR LITERS	SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS	INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS		T04	GALLONS PER DAY OR LITERS PER DAY
Disposal:			OTHER (Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)		
INJECTION WELL	D79	GALLONS OR LITERS			
LANDFILL	D80	ACRE-FEET (the volume that would cover one acre to a depth of one foot) OR HECTARE-METER			
LAND APPLICATION	D81	ACRES OF HECTARES			
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY			
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS			
UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE CODE
GALLONS	G	LITERS PER DAY	V	ACRE-FEET	A
LITERS	L	TONS PER HOUR	D	HECTARE-METER	F
CUBIC YARDS	Y	METRIC TONS PER HOUR	W	ACRES	S
CUBIC METERS	C	GALLONS PER HOUR	E	HECTARES	Q
GALLONS PER DAY	U	LITERS PER HOUR	H		

EXAMPLE FOR COMPLETING ITEM III (shown in line numbers X-1 and X-2 below): A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

S	C	DUP	T/A/C	I					
1	2	13	14	15					
LINE NUMBER	A. PRO- CESS CODE (from list above)	B. PROCESS DESIGN CAPACITY		FOR OFFICIAL USE ONLY	LINE NUMBER	A. PRO- CESS CODE (from list above)	B. PROCESS DESIGN CAPACITY		FOR OFFICIAL USE ONLY
		1. AMOUNT (specify)	2. UNIT OF MEASURE (enter code)				1. AMOUNT	2. UNIT OF MEASURE (enter code)	
X-1	S 0 2	600	G		5				
X-2	T 0 3	20	E		6				
1	S 0 1	2,400	G		7				
					8				
					9				
					10				
3									
4									

III. PROCESSES (continued)

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "T04"). FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

IV. DESCRIPTION OF HAZARDOUS WASTES

A. EPA HAZARDOUS WASTE NUMBER — Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. ESTIMATED ANNUAL QUANTITY — For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.

C. UNIT OF MEASURE — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE CODE
POUNDS. P
TONS T

METRIC UNIT OF MEASURE CODE
KILOGRAMS K
METRIC TONS M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES**1. PROCESS CODES:**

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES	
				1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				included with above

Continued from page 2.

NOTE: Photocopy this page before completing if you have more than 26 wastes to list.

Form Approved OMB No. 158-S80004

EPA I.D. NUMBER (enter from page 1)													FOR OFFICIAL USE ONLY																
W 0 4 D 0 0 0 2 1 4 7 0 3 1													W DUP 3 2 DUP																
DESCRIPTION OF HAZARDOUS WASTES (continued)																													
LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)				B. ESTIMATED ANNUAL QUANTITY OF WASTE				C. UNIT OF MEASURE (enter code)	D. PROCESSES																			
	23	24	25	26	27	28	29	30		31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50
1	D	0	0	5	35,400	00	00	00	P	S	0	1																	
2	F	0	0	1	9,600	00	00	00	P	S	0	1																	
3	U	0	0	2	600	00	00	00	P	S	0	1																	
4	U	1	3	4	300	00	00	00	P	S	0	1																	
5	U	1	5	4	100	00	00	00	P	S	0	1																	
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IV. DESCRIPTION OF HAZARDOUS WASTES (continued)**E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.**

EPA I.D. NO. (enter from page 1)

S	F	0	H	D	0	0	0	2	1	4	7	T/A	C
1	2	3	4	5	6	7	8	9	10	11	12	13	14

V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility (see instructions for more detail).

F6 A/55

VI. PHOTOGRAPHS

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

F6 A/56

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)

LONGITUDE (degrees, minutes, & seconds)

4	1	2	8	0	3	3
65	66	67	68	69	70	71

0	8	1	4	6	0	1	6
72	73	74	75	76	77	78	79

VIII. FACILITY OWNER

☒ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER

2. PHONE NO. (area code & no.)

3. STREET OR P.O. BOX										4. CITY OR TOWN										5. ST.										6. ZIP CODE									
F										G																													
15 16										17 18										19 20										21 22									

IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

D. E. Maguire

Vice President & General Manager

B. SIGNATURE

D E Maguire

C. DATE SIGNED

11/11/82

X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

B. SIGNATURE

C. DATE SIGNED

11901 Madison Avenue
Lakewood, Ohio 44107

Property Boundary - 1334 Feet

Property Boundary 968 Ft.

W. 117 ST.

Property Boundary 1658 Ft.

117 ST.

125 Ft.

LEGEND

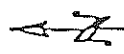
- A) Drum Storage Area 10'-0" x 15'-0" (Bldg.)
- B) Drum Storage Area 10'-0" x 12'-0"
- C) Past Storage Area 15'-0" x 20'-0"
- D) Past Storage Area 10'-0" x 15'-0"
- E) Future Storage Area 20'-0" x 20'-0"

NOTE:

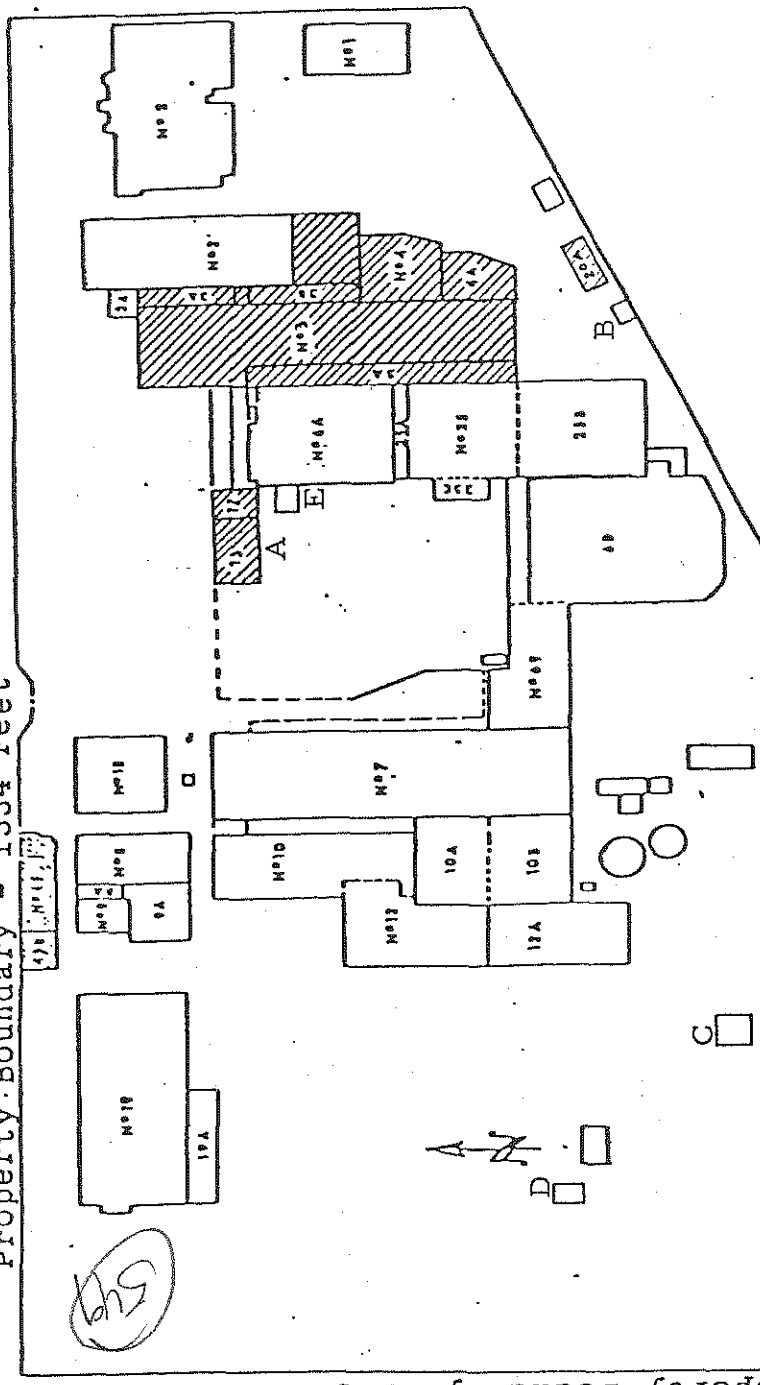
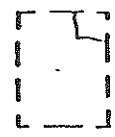
- 1. Entire property is bounded by chain link fence.
- 2. Scale: 1 inch = 200 feet



549



D



V. FACILITY DRAWING (see page 4)

349

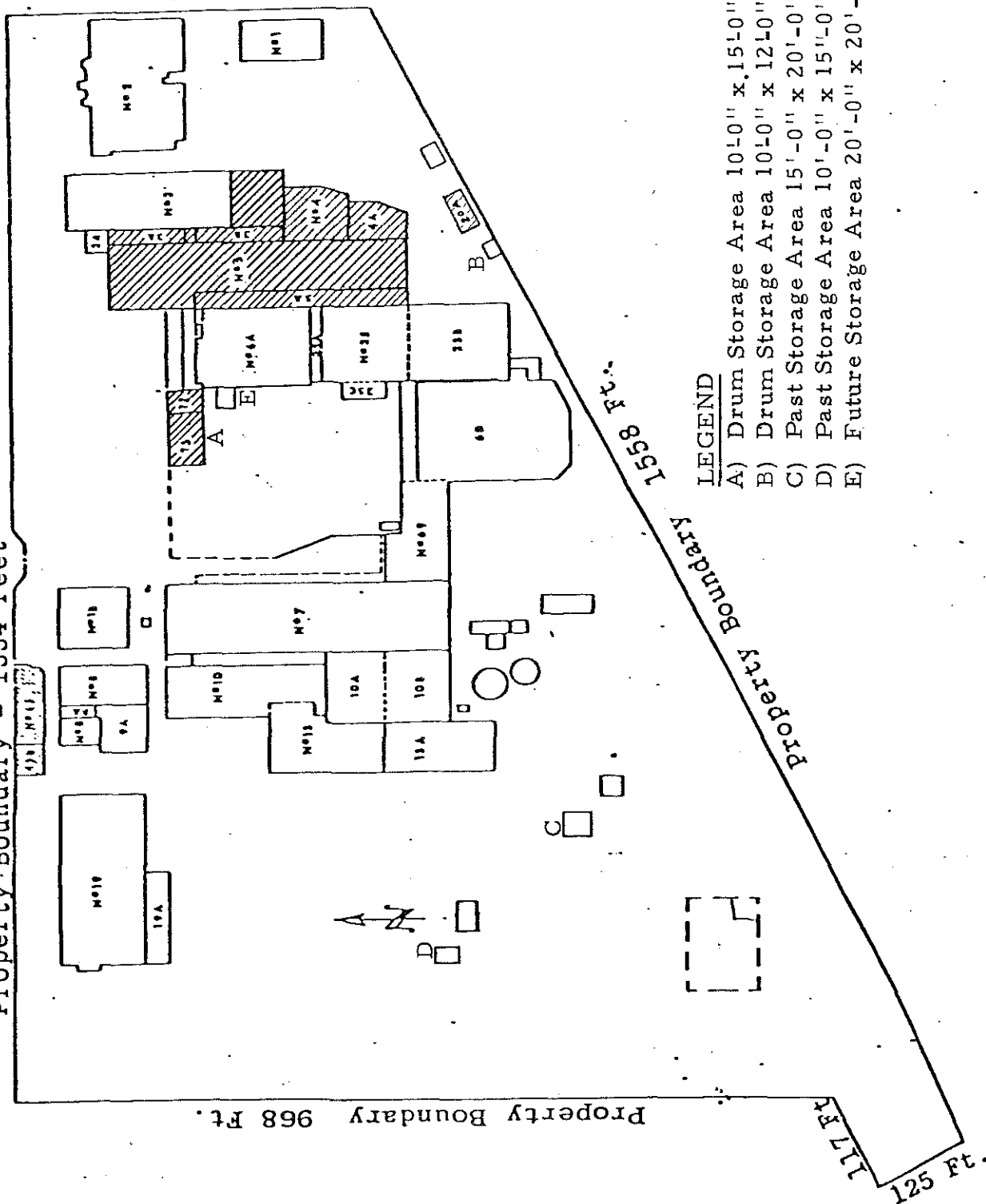
= Electronics Division

Union Carbide Corp.
11901 Madison Avenue
Lakewood, Ohio 44107

Property Boundary - 1334 Feet

Property Boundary 416 Ft.

W. 117 St.



LEGEND

- A) Drum Storage Area 10'-0" x 15'-0" (Bldg. 73)
- B) Drum Storage Area 10'-0" x 12'-0"
- C) Past Storage Area 15'-0" x 20'-0"
- D) Past Storage Area 10'-0" x 15'-0"
- E) Future Storage Area 20'-0" x 20'-0"

NOTE:

- 1. Entire property is bounded by chain link fence.
- 2. Scale: 1 inch = 200 feet



LEGEND - A



LEGEND - B



LEGEND - E



UNION CARBIDE CORPORATION OLD RIDGEBURY ROAD, DANBURY, CT 06817
Insurance Department

07D 000 821 470
August 23, 1983

Environmental Protection Agency
Region V Offices
230 South Dearborn Street
Chicago, Illinois 60604

RE: American Manufacturers' Mutual Insurance Company
Policy No. 3LE-576-090

Gentlemen:

Enclosed are certificates of insurance, as evidence of Union Carbide Corporation's non-sudden pollution/environmental impairment liability insurance under the above-captioned policy. You will note, this policy will become effective September 7, 1983. For your information, similar coverage under International Insurance Company policy #560-000-116 is being terminated as of that date.

These certificates have been issued in accordance with Section 40 CFR 264.147 and 265.147 of R.C.R.A. Insurance certificates have been issued for each hazardous waste treatment, storage and disposal facility owned/operated by Union Carbide located within your Region.

We trust these enclosures will be found in order.

Very truly yours,
UNION CARBIDE CORPORATION

Corporate Insurance Manager

RMThode:ls
enc.

RECEIVED
AUG 20 1983
WASTE MANAGEMENT
BRANCH

Hazardous Waste Facility Certificate of Pollution Liability Insurance

1. American Manufacturers Mutual Insurance Company, (the "Insurer"), of 5 World Trade Center, New York, New York 10048 hereby certifies that it has issued pollution liability insurance covering bodily injury and property damage to Union Carbide Corporation (the "insured"), of Old Ridgebury Road, Danbury, CT 06817 in connection with the insured's obligation to demonstrate financial responsibility under 40 CFR 264.147 or 265.147. The coverage applies at:

<u>Location Name</u>	<u>Address</u>	<u>EPA I.D. #</u>
Electronics Division	11709 Madison Avenue Lakewood, OH 44107	OHD-000821470
Films-Packaging Division	6733 West 65th Street Chicago, IL 60638	ILD-005152954 <i>Majors</i>
Films-Packaging Division	6733 West 65th Street Chicago, IL 60638	ILD-000821462
Films-Packaging Division	County Road 1450, South Kentland, IN 47951	IND-000708545
Specialty Chemicals & Plastics Division	River Road Marietta, OH 45750	OHD-077479467 <i>Maj</i>

nonsudden accidental occurrences.

The limits of liability are \$3,000,000. each occurrence, \$6,000,000. annual aggregate, exclusive of legal defense costs. The coverage is provided under policy number 3LE 576 090, issued on 9/7/83. The effective date of said policy is 9/7/83.

2. The Insurer further certifies the following with respect to the insurance described in Paragraph 1:
- (a) Bankruptcy or insolvency of the insured shall not relieve the Insurer of its obligations under the policy.
 - (b) The Insurer is liable for the payment of amounts within any deductible applicable to the policy, with a right of reimbursement by the insured

Hazardous Waste Facility Certificate of Pollution Liability Insurance

1. American Manufacturers Mutual Insurance Company, (the "Insurer"), of 5 World Trade Center, New York, New York 10048 hereby certifies that it has issued pollution liability insurance covering bodily injury and property damage to Union Carbide Corporation, (the "insured"), of Old Ridgebury Road, Danbury, CT 06817 in connection with the insured's obligation to demonstrate financial responsibility under 40 CFR 264.147 or 265.147. The coverage applies at:

<u>Location Name</u>	<u>Address</u>	<u>EPA I.D. #</u>
Linde Division	Lake Road East Ashtabula, OH 44004	OHD-000821454 <i>Mar</i>
Linde Division	4400 Kennedy Avenue East Chicago, IN 46312	IND-077001147 <i>Part B</i>
Battery Products Division	20575 Center Ridge Road Rocky River, OH 44116	OHD-000821421
Carbon Products Division	Town Street Fostoria, OH 44830	OHD-004167219
Carbon Products Division	11709 Madison Avenue Lakewood, OH 44107	OHD-004167383
Carbon Products Division	12900 Snow Road Parma, OH 44130	OHD-003926748

nonsudden accidental occurrences.

The limits of liability are \$3,000,000. each occurrence, \$6,000,000. annual aggregate, exclusive of legal defense costs. The coverage is provided under policy number 3LE 576 090, issued on 9/7/83. The effective date of said policy is 9/7/83.

2. The Insurer further certifies the following with respect to the insurance described in Paragraph 1:

(a) Bankruptcy or insolvency of the insured shall not relieve the Insurer of its obligations under the policy.

HAZARDOUS WASTE FACILITY CERTIFICATE OF LIABILITY INSURANCE

6H7 000 821 470

1. The International Insurance Company of Chicago, Illinois hereby certifies that it has issued liability insurance covering bodily injury and property damage to UNION CARBIDE CORPORATION of Chicago, Illinois in connection with the insured's obligation to demonstrate financial responsibility under 40 CFR 264.147 or 265.147. The coverage applies at Electronics Division - 11709 Madison Avenue, Lakewood, Ohio 44107
EPA Permit Number OHD-000821470

for non-sudden accidental occurrences.

The limits of liability are \$ 3,000,000. each occurrence and \$ 6,000,000. annual aggregate exclusive of legal defense costs. The coverage provided under policy number 560-000-116 issued on November 1, 1982. The effective date of said policy is 11/1/82.

2. The Insurer further certifies the following with respect to the insurance described in Paragraph 1:

(a) Bankruptcy or insolvency of the insured shall not relieve the Insurer of its obligations under the policy.

(b) The Insurer is liable for the payment of amounts within any deductible applicable to the policy, with a right of reimbursement by the insured for any such payment made by the Insurer. This provision does not apply with respect to that amount of any deductible for which coverage is demonstrated as specified in 40 CFR 264.147(f) or 265.147(f).

(c) Whenever requested by a Regional Administrator of the U.S. Environmental Protection Agency (EPA), the Insurer agrees to furnish to the Regional Administrator a signed duplicate original of the policy and all endorsements.

(d) Cancellation of the insurance, whether by the Insurer or the insured, will be effective only upon written notice and only after the expiration of sixty (60) days after a copy of such written notice is received by the Regional Administrator(s) of the EPA Region(s) in which the facility(ies) is (are) located.

(e) Any other termination of the insurance will be effective only upon written notice and only after the expiration of thirty (30) days after a copy of such written notice is received by the Regional Administrator(s) of the EPA Region(s) in which the facility(ies) is (are) located.

I hereby certify that the wording of this instrument is identical to the wording specified in 40 CFR 264.151(j) as such regulation was constituted on the date first above written, and that the Insurer is licensed to transact the business of insurance, or eligible to provide insurance as an excess or surplus lines insurer, in one or more States.

Frank Kinnett

Frank Kinnett
(Authorized Representative)

International Insurance Company
% The London Agency, Inc.

P. O. Box 4985, Atlanta, GA 30302

CERTIFICATE ISSUED TO:

Regional Administrator

EPA Region 5

230 S. Dearborn

Chicago, IL 60604



OHD 000 821 470
TBE
1230 W. Peachtree St., N. W.
P. O. Box 4985
Atlanta, Georgia 30302
(404) 875-9641
Telex 54-2445
TWX 810 751-3329

March 23, 1983

Regional Administrator
Environmental Protection Agency
Region V
230 S. Dearborn
Chicago, IL 60604

*ADDITIONAL INFORMATION
IS FILED WITH
OHD 000 821 454*

Gentlemen:

Hazardous Waste Facility
Certificate of Liability Insurance
Union Carbide Corporation
EPA #OHD-000821470, ILD-005152954, ~~000821454~~
ILD-000821462, OHD-077479467, OHD-00821454,
IND-077001147, OHD-000821462, OHD-004167219,
OHD-004167383, OHD-003926748, IND-000708545

In accordance with the terms of the Hazardous Waste Facility Certificate of Liability Insurance which we recently issued to your office, we are hereby notifying you of the expiration of this contract on April 30, 1983, in accordance with the provisions of Item 2 (e).

To assist you in matching up this notification with the original certification which was sent to you, I am enclosing a copy of the original certificate which we executed.

We feel that it is likely that this insured will purchase another policy at the renewal date but, because the renewal negotiation process has not been completed, we have no option but to give you the required advance notice of expiration of our coverage on April 30, 1983.

If renewal negotiations are satisfactorily completed, we will provide new certificates.

Sincerely,

A handwritten signature in cursive script that reads "Frank Kinnett".

Frank Kinnett
Vice President
International Insurance Company

bm

Enc.

**C.2 Compliance/
Enforcement**



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

230 SOUTH DEARBORN ST.

CHICAGO, ILLINOIS 60604

REPLY TO THE ATTENTION OF:

5HS JCK-13

JAN 31 1986

FEB 10 1986

Dear Sir or Madam:

Enclosed is a form for describing your efforts during 1985 to reduce the volume and toxicity of the hazardous waste which your business generates.

This information is being collected under the authority of Section 3002 of the Resource Conservation and Recovery Act, as amended by the Hazardous and Solid Waste Act Amendments of 1984. Please complete and return the form to us by March 1, 1986.

Use the following address to send in the completed report:

United States Environmental Protection Agency
Region V
RCRA Activities
P.O. Box A-3587
Chicago, Illinois 60690

Call (312) 886-6148, if you have questions. Thank you in advance for your cooperation.

Sincerely,

David B. Stringham
David B. Stringham, Chief
Solid Waste Branch

Enclosure

WASTE MINIMIZATION ADDENDUM TO GENERATOR BIENNIAL OR
ANNUAL HAZARDOUS WASTE REPORT FOR 1985

THIS REPORT IS FOR THE CALENDAR YEAR ENDING DECEMBER 31, 1985.

The Hazardous and Solid Waste Amendments of 1984 require all generators of hazardous waste to submit the following information to the United States Environmental Protection Agency or a State authorized to collect such information:

GENERATOR'S EPA I.D. No. 01H101018214701

GENERATOR NAME: Union Carbide Corporation, Electronics Division

GENERATOR ADDRESS: 11901 Madison Avenue, P.O. Box 6087

Lakewood, Ohio 44107

WASTE MINIMIZATION

Describe in the space below your efforts, undertaken during calendar year 1985, to reduce the volume and toxicity of the hazardous waste which your business generates. Also describe changes in waste volume and toxicity actually achieved during 1985 in comparison to previous years, to the extent possible.

Ohio EPA has recognized this facility as a small generator. Consequently, although we have not been required to do so, we now sell barium aluminates and barium metal oxide (originally listed as EPA hazard waste No. D005) to Barium & Chemicals, Inc. Please see attached.

CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

PRINT/TYPE NAME

W. A. Bagot

TITLE

Vice President
Electronics Div.
Union Carbide Corporation

SIGNATURE

W. A. Bagot

DATE SIGNED

2/21/86

BARIUM AND CHEMICALS, INC.

STEUBENVILLE, OHIO 43952
282-9776 AREA CODE 614

PURCHASE ORDER

No. 32953

THIS NUMBER MUST APPEAR ON ALL CORRESPONDENCE, INVOICES, PACKAGES AND BILLS OF LADING.

DATE: Dec. 31, 1985

SHIP TO OUR PLANT
P.O. B. STEUBENVILLE, OH
TERMS NET 30 DAYS
DELIVERY DATE ASAP
SHIP VIA BEST WAY

ALL DELIVERIES BETWEEN 8:00 A.M. TO 3:30 P.M.
MONDAY THROUGH FRIDAY ONLY

Sales Exempt No. 4304821-932 CHEM - 89

MAIL INVOICES IN TRIPLICATE ALSO SHIPPING PAPERS
IN TRIPLICATE TO

BARIUM AND CHEMICALS, INC.

STEUBENVILLE, OHIO 43952

Union Carbide Corp.
ELECTRONICS DIVISION
P.O. 6087
Cleveland, OH 44101

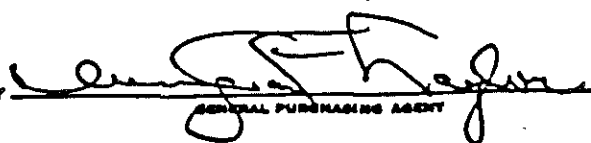
PLEASE FURNISH THE FOLLOWING ARTICLES SUBJECT TO CONDITIONS PRINTED ON REVERSE OF THIS ORDER

QTY. NO.	ITEM NO.	DESCRIPTION	UNIT	PRICE	DISCOUNT	AMOUNT
	1.	Barium Metal Oxide - 4 Tons	Ton	\$40/Ton		
<p>CONFIRMING ORDER TO TOM MADDEN FROM OUR Mr. Naylor -- VP Purchasing</p> <p>DO NOT DUPLICATE . INVOICE IN TRIPLICATE</p> <p>Please Mark Bill of Lading Morning Delivery Only Call (614) 282-9776 Prior to Delivery Also Mark Bill Of Lading NVX</p>						

PLEASE ACKNOWLEDGE BY RETURN MAIL AFTER NOTING CONDITIONS ON REVERSE SIDE
NO CHANGE WILL BE PERMITTED IN THIS ORDER UNLESS BY WRITTEN AGREEMENT. TIME IS THE ESSENCE OF THIS ORDER AND
DELIVERIES SHALL BE MADE AS SET FORTH.
ORIGINAL BILL OF LADING TO BE FORWARDED DAY OF SHIPMENT TO OUR TRAFFIC DEPARTMENT.
FEDERAL OCCUPATIONAL SAFETY
AND HEALTH ACT OF 1970

Seller agrees that all materials supplied hereunder shall comply with all applicable requirements and specifications (in effect on the date of shipment) of the Federal Occupational Safety and Health Act of 1970 as amended, and all Rules and Regulations adopted thereunder. Seller further agrees to indemnify and save harmless Buyer from and against any and all liability, claims, loss and expenses, including attorneys' fees, arising from any citation, order injunction, action or other relief resulting from failure of any of the materials to comply with said Act, Rules or Regulations. It is provided, however, that Seller shall not be liable for any such liability caused solely by improper or abnormal installation, use, maintenance or operation of the materials.

BARIUM AND CHEMICALS, INC.

BY 
GENERAL PURCHASING AGENT

BARIUM AND CHEMICALS, INC.

STEUBENVILLE, OHIO 43952
282-9776 AREA CODE 614

PURCHASE ORDER

No. 32938

THIS NUMBER MUST APPEAR ON ALL CORRESPONDENCE, INVOICES, PACKAGES AND BILLS OF LADING.

DATE: 12-12-85

Union Carbide Corporation
P.O. Box 32938
Cleveland, OH 44101
ATTN: Tom Madden

SHIP TO	OUR PLANT
F. O. B.	STEUBENVILLE, OH
TERMS	NET 30 DAYS
DELIVERY DATE	ASAP
SHIP VIA	BEST WAY

**ALL DELIVERIES BETWEEN 8:00 A.M. TO 3:30 P.M.
MONDAY THROUGH FRIDAY ONLY**

Sales Exempt. No. 4304821-932 CHEM - 89

MAIL INVOICES IN TRIPLICATE ALSO SHIPPING PAPERS
IN TRIPLICATE TO

BARIUM AND CHEMICALS, INC.

STEUBENVILLE, OHIO 43952

PLEASE FURNISH THE FOLLOWING ARTICLES SUBJECT TO CONDITIONS PRINTED ON REVERSE OF THIS ORDER

[illegible]

Please Mark Bill of Lading Morning Delivery Only.
Call (614) 282-9775 Prior to Delivery
Also Mark Bill Of Lading NVX

CONFIRMING ORDER DO NOT DUPLICATE
INVOICE IN TRIPLICATE

PLEASE ACKNOWLEDGE BY RETURN MAIL AFTER NOTING CONDITIONS ON REVERSE SIDE
NO CHANGE WILL BE PERMITTED IN THIS ORDER UNLESS BY WRITTEN AGREEMENT. TIME IS THE ESSENCE OF THIS ORDER AND
DELIVERIES SHALL BE MADE AS SET FORTH.
ORIGINAL BILL OF LADING TO BE FORWARDED DAY OF SHIPMENT TO OUR TRAFFIC DEPARTMENT.
FEDERAL OCCUPATIONAL SAFETY
AND HEALTH ACT OF 1970

Seller agrees that all materials supplied hereunder shall comply with all applicable requirements and specifications (in effect on the date of shipment) of the Federal Occupational Safety and Health Act of 1970 as amended, and all Rules and Regulations adopted thereunder. Seller further agrees to indemnify and save harmless Buyer from and against any loss, liability, claims, loss and expenses, including attorneys' fees, arising from any citation, order injunction, action or other relief resulting from failure of any of the materials to comply with said Act, Rules or Regulations; provided, however, that Seller shall not be liable for any such loss or operation of the materials.

BARIUM AND CHEMICALS, INC.

GENERAL PURCHASING AGENT



inter-office communication

to: Kevin O'Grady, DSHM, Central Office date: March 28, 1985
from: Debby Berg, DSHM, Northeast District Office
subject: Union Carbide Corporation - Electronics Division - OHD 000-821-470

Please find attached Union Carbide's response to my February 13, 1985 inspection letter.

This facility will now be managing their solvent waste in compliance with the small quantity generator (100-1000 kg) rule and RCRA statute. They are also going through "quickie closure" with U.S. EPA (copy of certification form attached) for those solvent wastes previously stored in excess of 90 days.

DB:kr

Attachment

cc: Tom Carlisle, DSHM, C.O.

RECEIVED
OHIO EPA

APR 2 1985

DIV. of SOLID & HAZ. WASTE MGT.



UNION CARBIDE CORPORATION 11901 MADISON AVENUE, CLEVELAND, OH 44101
ELECTRONICS DIVISION TELEPHONE: 226 2824, AREA CODE: 216 • TWX: 810 421 8314

ADDRESS REPLY TO: P.O. BOX 6087, CLEVELAND, OHIO 44101

ON 0000 821 470
RECEIVED
MAR 26 1985
HWEB

March 22, 1985

Deborah J. Berg
District Inspector
Division of Solid & Hazardous
Waste Management
Northeast District Office
2110 E. Aurora Road
Twinsburg, Ohio 44087

Dear Ms. Berg:

Pursuant to our recent conversation, it is our intention to manage our solvent waste (oil-trichlorethane 1.1.1. from degreaser) in compliance with the RCRA statute from wastes generated in the 100-1000 Kg/month quantity.

The manner in which this solvent will be managed is as follows:

1. Accumulate waste material in 55 gallon drums (STC-DOT-17E).
 - A. One (1) drum will be located in the R.T. production area and one (1) drum in the T.V. degreaser area.
 - B. Drums shall be affixed with hazardous waste labels and marked with accumulation start date, E.P.A. hazardous waste number, and Ohio E.P.A. I.D. number.
 - C. Drums will accumulate at an approximate rate of 500 lbs. (227 Kg) per 30 days and moved to the centrally enclosed hazardous waste storage area.
2. The shipping department, which moves the solvent into the central storage area, will record the drum into the "waste-triclor" accumulation log.

3. After the 4th full drum is recorded (900 Kg), the shipping and receiving supervisor will make arrangements to move accumulated material off site to our reclaimer.

Enclosed, please find a signed copy of the "Request for Change in Status" form sent to us by Kathy Homer of U.S. E.P.A. Region V.

Please contact me on any further questions.

Sincerely,



Phillip A. Costanzo
Engineering Manager
U.C.C. - Electronics Div.

/vdw

Enclosure

cc: T.H. Madden
P.R. Hostacky
Kathy Homer/U.S. E.P.A. Region V
Chicago, IL 60604

GENERATOR ACCUMULATING WASTE ON-SITE IN COMPLIANCE WITH 40 CFR 262.34"

(APPLICABLE TO FACILITIES WHICH, AS OF NOVEMBER 19, 1980, HAVE BEEN
STORING WASTES IN CONTAINERS AND/OR TANKS ONLY)

Facility Name: UNION CARBIDE CORP., ELECTRONICS DIVISION

Facility Location: 11901 MADISON AVENUE

Mailing Address: P.O. BOX 6087

U.S. EPA ID No.: OHDO0821470

1. I certify, in reference to the above-named facility, that a complete and accurate description of the activities currently conducted, for purposes of the Resource Conservation and Recovery Act (RCRA), are those of a generator accumulating waste on-site, in compliance with 40 CFR 262.34. This description of activities shall be considered effective as of

March 14, 1985(please type, in above space: today's date,
or other appropriate past date)

2. I certify that all hazardous waste which had been stored at this facility for greater than 90 days have been permanently removed, and -- for that portion of the wastes that were present on-site on or after November 19, 1980 -- the manifest requirements of 40 CFR Part 262 have been complied with, and all manifests are on file at this facility, available for inspection by authorized State and Federal officials.
3. I finally certify under penalty of law that I have personally examined, and am familiar with the information submitted in this document and all attachments, and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.



D. E. Maguire, V-P

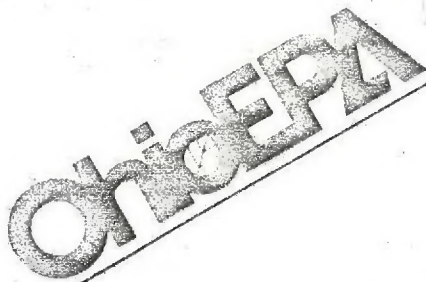
3/19/85

Signature

Typed Name and Title

Date

(Please have appropriate official, per 40 CFR 122.6, sign and date)



Re: Union Carbide - Electronics Division
Cuyahoga County
OHD 000-821-470
G/SQG

Phillip A. Costanzo, Engineering Manager
Union Carbide Corporation
Electronics Division
11901 Madison Avenue
P.O. Box 6087
Cleveland, Ohio 44101

February 13, 1985

RECEIVED

FEB 21 1985

WASTE MANAGEMENT
BRANCH

Dear Mr. Costanzo:

This letter is in follow-up to my December 12, 1984 inspection at the Union Carbide - Electronics Division facility and is intended to advise you of your regulatory obligations as relates to the management of hazardous wastes in the State of Ohio. During the inspection, we viewed the manifest records for waste solvents being shipped off-site for reclaim and discussed your current management practices for three characteristically hazardous process residues generated at the facility.

According to U.S. EPA records, the Part A application filed for the Electronics Division facility was never formally withdrawn. This application indicated an intent to store for greater than 90 days D005, F001, U002, U134, and U154 wastes in containers. If it is your intention not to act as a RCRA storage facility, you should contact Ms. Kathy Homer of U.S. EPA - Region V (312-886-6191) to initiate the application withdrawal procedure. You will be required to notify U.S. EPA, in writing, of the types and quantities of all hazardous wastes generated at the facility since November 19, 1980 and whether any of those wastes were treated, stored (> 90 days) or disposed of on-site. This information will be needed by U.S. EPA in order to determine whether closure activities are required of Union Carbide prior to withdrawal of the Part A application. If the only activity conducted at the facility was storage of wastes in containers, Union Carbide - Electronics Division may qualify for the simple closure mechanism which will be explained to you by Ms. Homer. In order to demonstrate that the storage of the characteristically hazardous process residues is not regulated under current rules, Union Carbide will need to describe its recycling efforts since November 19, 1980, and certify that these process residues have not been disposed of as wastes.

Assuming that you intend to proceed with the withdrawal, please inform this office within 30 days of your intention to either manage your listed solvent waste in accordance with the generator standards (OAC Chapter 3745-52, et al) or in compliance with the RCRA statute for wastes generated

February 13, 1985

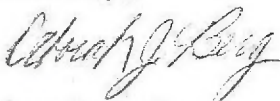
in a 100 - 1000 kg/month quantity. For your information, I have enclosed a copy of the anticipated general language of that statute which is effective August 9, 1985. Secondly, as you may be aware, new recycle regulations have been finalized by U.S. EPA with an effective date of July 5, 1985. I refer you to the January 4, 1985 Federal Register for the text and background discussion of these rules and strongly urge you to familiarize yourself with them as they will impact the future management of recyclable materials. When interpreting these rules particularly with regards to your barium-containing process residues, you will see that Union Carbide holds the burden of proof to demonstrate that these residues are not "solid wastes" and thereby exempt from regulation. Some of the factors which you will need to consider are:

1. How are the residues being reused by the off-site facilities? Are the residues being used as effective substitutes for other raw materials, are they being used as ingredients without first being reclaimed, and can it be demonstrated that the useage of these residues does not constitute "sham recycling" or "surrogate disposal", etc; and,
2. can Union Carbide demonstrate that the residues are not being "speculatively accumulated?" Do the residues have known recycling potential, can they be feasibly recycled, and can it be shown that at least 75 percent of the residue accumulated on-site at the beginning of the year (starting January 1985) has been shipped off-site for recycling by the end of the year.

To this end, I would suggest that you make sure markets for these residues are secured, that you get specific information from the recyclers about how they handle and use these residues, and that you begin keeping inventory records of the generation and off-site shipment rates for these materials.

Hopefully these comments will be of help to you. Please feel free to contact me if you need further assistance.

Sincerely,



Deborah J. Berg
District Inspector
Division of Solid & Hazardous Waste Management
Northeast District Office

DJB:kr

Enclosure

cc: Kevin O'Grady, DSHWM, Central Office
Kathy Homer, U.S. EPA-Region V



UNION CARBIDE CORPORATION 11901 MADISON AVENUE, CLEVELAND, OH 44101
ELECTRONICS DIVISION TELEPHONE: 226 2824, AREA CODE: 216 • TWX: 810 421 8314

ADDRESS REPLY TO: P.O. BOX 6087, CLEVELAND, OHIO 44101

December 19, 1984

Ms. Deborah J. Berg
District Inspector
Division of Hazardous Material Management
Ohio E.P.A.
2110 E. Aurora Road
Twinsburg, Ohio 44087-1969

Dear Ms. Berg,

This letter is to summarize our conversation during your visit to our Plant on December 13, 1984.

We originally listed barium residue (D005) and trichloroethane 1.1.1. (F001) as hazardous wastes on our original RCRA application for hazardous wastes permit (E.P.A. I.D. No. OHD 00821470).

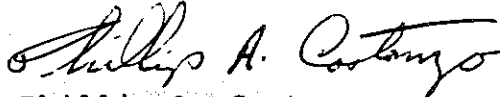
However, since that application we have been shipping barium residue (starting in May of 1981) to Barium and Chemicals which they use as a raw material in their manufacturing processes (See attachment I). Barium residue is our largest volume barium by-product, averaging an estimated net weight of 42,000 pounds per year.

Trichloroethane 1.1.1. is what we presently consider a hazardous waste which we accumulate at an average rate of 500 pounds per month (approximately 1-55 gallon drum).

Our other barium by-products consists of dry barium-aluminum nickel powder which we sell to scrap metal re-cyclers such as Atlas Metal Company (See attachment II) and oil-wet barium-aluminum nickel powder who we presently are negotiating with M. Pashelinsky and Sons of Jersey City, New Jersey. Dry barium-aluminum nickel powder is collected at the rate of approximately 2,000 pounds per year and oil-wet barium-aluminum nickel powder at 600 pounds per year.

As discussed, please advise as to guidelines and regulations to maintain "Small Generator" status. Thank you for your help.

Very truly yours,



Phillip A. Costanzo
Engineering Manager

/vdw

Attachments (2)

cc: T.H. Madden
P.R. Hostacky
H.A. Fisch
H.D. Smilie - Greenville

**BC BARIUM AND
CHEMICALS, INC.**

USE BARCO PRODUCTS

STEUBENVILLE, OHIO / AREA CODE 614 · 282-9776

December 5, 1984

Union Carbide Corp.
Electronics Div.
11901 Madison Ave.
Box 6087
Cleveland, Ohio 44101

Att Pete Hostacky

Subject: Barium Residue

Gentlemen:

In accordance with our telephone conversation of this afternoon, we wish to advise that the Barium Residue that you send us is mixed with other materials and incorporated into a product which we sell.

We trust that this is the information desired.

Yours truly,

BARIUM AND CHEMICALS, INC.

Albert Pavlik Jr.
Albert Pavlik, Jr.
Vice President

APJ;dmp

RECEIVED

DEC 14 1984

Union Carbide Corp.

MANUFACTURERS OF Compounds of Barium, Strontium, Calcium

Manganese, Antimony, Lithium, and also Metallurgical Specialties.



Serving Industry Since 1916

CREDIT MEMORANDUM

ATLAS METAL ~~INC.~~ DIV.

No. A 39420

P.O. BOX 05210
8550 AETNA ROAD
CLEVELAND, OHIO 44105

July 31, 1984

F.O.B. Your Plant

VIA Our Truck

CAR INITIAL
AND NUMBER

INVOICE DATE

DATE RECEIVED 5/14/84

CHECKED BY T

TO

Union Carbide Corp.
P.O. Box 6087
Cleveland, Ohio 44101
Attn: Mr. Peter Hostacky

ids,
ins,

Nickel Barium Powder

11219-450-10769#

.51/lb *

\$ 5492.19

* (1.20Ni/ unit x 42.5%)

CUSTOMER COPY

ALL REJECTS WILL BE HELD FOR 7 DAYS AFTER WHICH THEY WILL BE DISPOSED OF.

Delete TSD 9-22-81 86



UNION CARBIDE CORPORATION
ELECTRONICS DIVISION

11901 MADISON AVENUE, CLEVELAND, OHIO 44101

TELEPHONE: 226-2824, AREA CODE: 216 • TWX: 810-421-8314

ADDRESS REPLY TO:

P.O. BOX 6087

CLEVELAND, OHIO 44101

April 6, 1981

RCRA Activities
P.O. Box 7861
Chicago, Illinois 60680

Ref: E.P.A. I.D. No. DHD000B21470 ^{OK}

Gentlemen:

In accordance with our recent conversation, this is to inform you that our barium residue is stored on site less than 90 days. In fact our barium residue is taken back to our supplier for re-cycling on a monthly basis. Therefore it is my understanding we will not be required to have a permit to store hazardous waste. (Reference Fed. Register /Vol 45 No. 98 May 19, 1980 Par. 262.34)

Please call on any questions.

Very truly yours,

Phillip A. Costanzo
Engineering Manager

vdm

IRREG. SUB. NOT.

cc: T.H. Madden
H.A. Fisch
E.E. Frye
H.M. Parker
K. Shea

APR 13 1981

**D. Corrective
Action**

**PRELIMINARY ASSESSMENT/VISUAL SITE INSPECTION
FOR
FORMER GETTERS CORPORATION OF AMERICA
11901 MADISON AVENUE
LAKEWOOD, OHIO
EPA ID No. OHD000821470**

Submitted to:

**Mr. Gerald Phillips
U.S. Environmental Protection Agency
Region 5 D-8J
77 West Jackson Boulevard
Chicago, Illinois 60604**

Submitted by:

**TechLaw, Inc.
20 North Wacker Drive, Suite 1260
Chicago, Illinois 60606**

**EPA Work Assignment No.
Contract No.
TechLaw WAM
Telephone No.
EPA WAM
Telephone No.**

**R05052
68-W4-0006
Mr. Bill Wesley
312/345-8955
Mr. Gerald Phillips
312/886-0977**

August 20 1998

D-8J

September 11, 1998

Ms. Patricia Brown-Derocher
Regional Manager
TechLaw, Inc.
20 North Wacker Drive
Suite 1260
Chicago, Illinois 60606


Reference: contract No. 68-W4-00006; Work Assignment R05052

Dear Ms. Brown-Derocher:

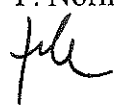
Thank you for your August 20, 1998, letter regarding the Former Getters Corporation of America facility (OHD 000 821 470) located in Lakewood, Ohio. The report is adequate and I have concluded that the submission along with the scoring sheets will constitute the final deliverable for the facility. Please provide a copy of the final report to the appropriate OEPA and facility contacts.

Do not hesitate to call me at (312) 886-0977 should you have additional questions or need additional clarification.

Sincerely,


Gerald W. Phillips
Corrective Action Process Manager
Waste, Pesticides and Toxics Division

cc: Bill Wesley, TechLaw
F. Norling, U.S. EPA





TECHLAW INC.

20 NORTH WACKER DRIVE, SUITE 1260, CHICAGO, IL 60606

PHONE: (312) 578-8900

FAX: (312) 578-8904

RZ2.R05052.01.ID.233

August 20, 1998

Mr. Gerald Phillips
U.S. Environmental Protection Agency
Region 5, D-8J
77 West Jackson Boulevard
Chicago, Illinois 60604

Reference: EPA Contract No. 68-W4-0006; Work Assignment No. R05052; Environmental
Priorities Initiative (EPI) Assessments; Former Getters Corporation of America,
Lakewood, Ohio; EPA ID No. OHD000821470; PA/VSI Report and NCAPS
Scoring Report; Task 04 Deliverable

Dear Mr. Phillips:

Please find the enclosed Preliminary Assessment/Visual Site Inspection (PA/VSI) Report and the
NCAPS Scoring Report for the above-referenced facility. The NCAPS total migration score is
14.68, which appears to be reflective of site conditions.

Should you have any questions or require additional information, please contact me at 312-345-
8963 or Mr. Bill Wesley at (312)345-8955.

Sincerely,

Patricia Brown-Derocher
Regional Manager

cc: F. Norling, EPA Region 5 (w/o Attachments)
W. Jordan/Central Files

W. Wesley
Chicago Central File

c:\ehs\52\52id233.wpd



**PRELIMINARY ASSESSMENT/VISUAL SITE INSPECTION
FOR
FORMER GETTERS CORPORATION OF AMERICA
11901 MADISON AVENUE
LAKEWOOD, OHIO**

EPA ID No. OHD000821470

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Appendix D Correspondence and Questionnaire to Getters Corporation of America

I. EXECUTIVE SUMMARY

The RCRA Facility Assessment (RFA) is the first step in implementing the corrective action provisions of the 1984 Hazardous and Solid Waste Amendments (HSWA) to the Resource Conservation and Recovery Act (RCRA). The purpose of the RFA is to identify environmental releases or potential releases from Solid Waste Management Units (SWMUs) and Areas of Concern (AOCs) that may require corrective action by the facility owner. A preliminary assessment/ visual site inspection (PA/VSI) is a form of an RFA suitable for implementing the corrective action provisions of HSWA. This PA/VSI Report constitutes the reporting requirements for the RFA at the former Getters Corporation of America (Getters) facility in Lakewood, Ohio.

A preliminary assessment (PA) of the available U.S. Environmental Protection Agency (U.S. EPA) file materials was conducted to familiarize the TechLaw, Inc. (TechLaw) team with past compliance history, evidence of past releases, potential migration pathways, potential exposure to any released hazardous constituents, closure methods and dates, citizen complaints, manufacturing processes and waste management practices at the former Getters facility.

A Visual Site Inspection (VSI) was conducted at the former Getters facility on July 9, 1998, by the TechLaw team to identify and characterize SWMUs and AOCs. Getters operated at this facility from September 1987 until January 1989. Although TechLaw requested that Getters personnel attend, current Getters personnel chose not to participate in the VSI. The TechLaw team did meet with UCAR Carbon (UCAR) personnel, the current operators of the facility. The TechLaw team met with Mr. Edwin E. Frye, Environmental Affairs, Mr. Terry W. Wilkinson, Manufacturing Manager, and Mr. Matthew Scerba, Summer Intern. UCAR operated at the facility simultaneously during Getters' operation period. However, UCAR personnel had limited knowledge regarding the processes and waste management practices conducted by Getters and were unable to identify any definite SWMUs or AOCs where Getters operated. TechLaw submitted a follow-up letter and questionnaire (the questionnaire) (attached hereto as Appendix D) to Getters on July 16, 1998. Getters response was received by TechLaw on August 14, 1998, and was used by TechLaw to identify SWMUs specific to Getters' operation at the facility. The photographs taken during the VSI are documented as Appendix A. The VSI Field Notebooks are included as Appendix B, a site map is presented as Appendix C, and the questionnaire, including Getters' response, is attached as Appendix D.

Based on TechLaw's preliminary file assessment, visual site inspection of the former Getters site, and the completed questionnaire received by Getters, two SWMUs and no AOCs specific to Getters' operation at the site were identified. SWMUs are discussed in Section III of this report. Low release potentials have been assigned to both SWMUs.

II. SITE DESCRIPTION

The TechLaw Team obtained site description information during a site walk-through and from a U.S. EPA PA/VSI Report prepared by PRC Environmental Management, Inc. (PRC) on February 9, 1992, for the UCAR facility. The Report prepared by PRC (PRC Report) does not specifically identify and/or discuss areas (i.e., SWMUs and/or AOCs) operated by Getters and was prepared for the entire site as operated by UCAR only. In addition, TechLaw also used the information included in the questionnaire response provided by Getters.

The former Getters facility is currently owned and operated by UCAR and is located at 11901 Madison Avenue in Lakewood (a suburb of Cleveland), Cuyahoga County, Ohio. UCAR and Getters operated at this location simultaneously.

The facility is fenced and visitors are required to pass through security, and obtain badges and a parking permit prior to gaining access to the site.

The former Getters facility is located approximately one mile south of Lake Erie in an industrial/commercial district of Lakewood, Ohio. The facility is fenced and bound on the north by Madison Avenue, and commercial storefronts, fast food restaurants, and convenience stores, on the east by West 117th Street, on the south by Conrail and Regional Transit Authority (RTA) railroad lines, and on the west by Magee Street, an area of single-family homes.

Facilities began operating at this location in 1892. Originally the site operated as National Carbide Corporation, but, after consolidating with other companies, later became Union Carbide Corporation, and eventually UCAR, a former subsidiary of Union Carbide.

Getters purchased the KEMET business of Union Carbide and operated a manufacturing facility on the property of Union Carbide from September 1987 through December 1988. The manufacturing process was completely relocated to a new facility in January 1989. According to the PRC Report, the KEMET business manufactured getters, tantalum capacitors, silicon metal, silicon monoxides, and silicon dioxides. File documentation reviewed during the PA indicates that manufacturing practices remained the same after Getters' purchase of the KEMET business from Union Carbide; however, Getters' response to the questionnaire indicates that only getter manufacturing occurred. According to Getters' response to the questionnaire, Getters' manufacturing of getters utilized furnacing operations to convert barium carbonate oxide to barium metal, which created barium residue (54% barium, 23% aluminum, 23% oxygen) as a by-product. In addition, Getters operated two dust collection devices (presumably as air pollution control measures associated with Getters' furnacing operations) and collected two dust waste streams (60% nickel, 20% barium, 20% aluminum) and (50% barium, 50% nickel). Degreasing operations resulted in the generation of waste 1,1,1-trichloroethane.

Currently, UCAR produces Grafoil graphite, which is flexible graphite manufactured in sheet form. Grafoil is used in automotive gaskets and seals, valve and pump packings, and furnace insulation. The facility is operational 24 hours per day, five days a week. According to current UCAR employees, the former Getters facility operated within a larger facility on a 22 acre property and had operations in 10 of the site buildings. These buildings are identified in Appendix C as Building Numbers 3, 3A, 4, 4A, 5, 5A, 5B, 20, 20A, and 73. Getters operated the

Former Container Storage Area 1 (SWMU 1) adjacent to the southern, exterior wall of Building 73. This area is identified as area "A" in Appendix C.

The buildings in which Getters reportedly operated and the activities performed are presented below. It appears that all buildings and areas where Getters reportedly operated are currently used by UCAR and were included in the PRC Report.

Building 3: According to UCAR employees, the southern part of this building may have been used by Getters. However, it is not known what Getters used this building area for.

Building 3A: The southern part of this building is a woman's restroom reportedly used by Getters.

Building 4: This building is currently used by general contractor's for storage of equipment, such as tools, etc. This building has a tile floor underlain by wood and brick. It is not known if Getters used this building for the same purpose.

Building 4A: This building area is a maintenance shop. The floor is concrete with no obvious cracks or stains. Walls are concrete block/brick. Building 4A has a concrete-floored, second story that is used for general storage space.

Building 5: This building currently is an employee cafeteria and previously served as a warehouse. According to Getters' response to the questionnaire, a loading dock outside of this building was used for storage of dust collected and spent degreasing fluid with oil residue prior to shipment (Former Container Storage Area 2 - SWMU 2). This building has a concrete floor with minor cracks, but no staining or liquid materials were observed. Also, no drains or sumps were observed in any floor areas of this building. The northern part of this building is currently used for storage of in-process materials.

Building 5A: The northern part of this building currently is a training/meeting room. The southern part serves as foreman offices. There is a tile floor over concrete in both areas of this building. The walls are brick and concrete block.

Building 5B: The building is no longer standing. This was a lean-to style building that formerly served as administrative office space for the KEMET/Getters operations. This area is now the entrance to the cafeteria in Building 5.

Building 20: This building, not shown on the site layout map in Appendix C, was just east of Building 4A and was razed sometime prior to 1994. This building was used by the KEMET process prior to Getters' operation at the facility. This area is now an asphalt parking lot.

Building 20A: This building is currently used for storage of sheet metal. At the time of the VSI, the building had a concrete floor with minor cracks, but no staining or liquids were present. UCAR employees thought this area was used by KEMET/Getters for storage.

Building 73: During the time of Getters' operation at this facility, this was one building. This building was extended to the west and rebuilt by UCAR around 1995 and currently is identified as Buildings 72 and 73. There currently is a product transfer area adjacent to Buildings 72 and 73. Building 72 currently houses product materials such as sulfuric acid and sodium hydroxide in large, above ground tanks with approximately 4 foot high, concrete dikes.

Area A: Per UCAR employees and Getters' response to the questionnaire, this area is the Former Container Storage Area 1 where container storage of barium residue was located during Getters' operation at the facility. At the time of the VSI, this area were covered with a concrete pad which slopes to a drain at the garage door opening entering Buildings 72 and 73. The pad is outside and was not part of the reconstruction of Buildings 72 and 73 discussed above.

Regulatory History

On August 31, 1987, Union Carbide, Electronics Division, notified the Ohio Environmental Protection Agency (OEPA), Division of Solid and Hazardous Waste Management of the impending sale of the "KEMET" business of Union Carbide Corporation (i.e., Union Carbide Corporation, Electronics Division) to Getters. This notification identified the facility as a small quantity generator registered under EPA ID No. OHD 000 821 470 and indicated that the facility most likely would continue to operate under the current EPA ID No.

On January 18, 1988, Getters notified U.S. EPA, Region 5, that, as of September 1, 1987, they took ownership of the Union Carbide, Electronics Division operations at 11901 Madison Avenue, Lakewood, OH, and that Getters was still a small quantity generator. In addition, Getters notified U.S. EPA that they would be moved to a new facility during 1988 and that, at that time, a hazardous waste activity application would be filled out in which a new ID No. would be issued for the new site.

On May 17, 1988, Getters sent information to U.S. EPA, Region 5, regarding a withdrawal of RCRA Part A application. In addition, Getters stated that it was a small quantity generator that it did not treat hazardous waste of any kind or store hazardous waste on site for more than 90 days; therefore, Getters understood that it was not required to have a RCRA permit to store hazardous waste. Finally, this information stated that Getters was not responsible for any closure procedures that may be required. It is unclear from the available file material at what point Getters was considered to be or notified as other than a generator of hazardous waste.

On September 16, 1988, U.S. EPA Region 5, RCRA Permitting Branch, notified Getters that it's May 17, 1988, request for a change in status under RCRA was approved and that Getters now was considered a "generator of hazardous waste" and that the facility is no longer considered a treatment, storage, or disposal facility, which would require a RCRA Part B permit to operate. In addition, EPA stated that all interim status duties were transferred to Getters and that approval of the change in status did not release Getters from any responsibilities for corrective action from all releases of hazardous waste or constituents from SWMUs.

On February 7, 1989, Getters submitted to U.S. EPA, Region 5, an application for a new EPA ID No. due to Getters' relocation to a new site.

On February 10, 1989, U.S. EPA, Region 5, informed Getters that it was inactivating Getters' current EPA ID No. (OHD000821470) and that it was in the process of issuing a new number for the facility located at 5604 Valley Belt Rd.

No further regulatory information (e.g., permits or notices of violation) specific to Getters' operation of the facility located at 11901 Madison Avenue, Lakewood, Ohio, was noted during the PA.

Environmental Setting

Environmental setting information for the Getters facility was obtained from the PRC Report for the UCAR facility.

The former Getters facility is located in a mixed residential and industrial area in Lakewood, Ohio, with residences less than 1/4 mile from the site to the north and west. No sensitive environments are found within a 1-mile radius of the former Getters facility.

Large amounts of water can be stored in alterations of sand and gravel with clay in the glacial drift in the area where the facility is located. The contact of the glacial drift with the underlying Bedford, Orangeville, and Meadville shales is also a water source, especially where the drift is thick and consists largely of sand and gravel. There also are water-bearing sandstone strata within the Chagrin, Cleveland, and underlying shales of Portage age; however, the immediate area around the former Getters facility is underlain largely by Chagrin shales that contain very little or no potable water. The shale bedrock in the vicinity of the former Getters facility acts as a hydrologic barrier. This barrier prevents the downward migration of water from the surficial unconsolidated deposits.

Groundwater does not occur as a uniform water table underneath the former Getters facility. Groundwater depth is approximately 2 to 12 feet at the former facility. TechLaw contacted Mr. Scott Moegling, OEPA, Division of Drinking and Groundwater, and Ms. Joanne Williams, Lakewood Health Department, Water Division. According to OEPA and the Lakewood Health Department, no public water supply well systems exists within a 2-mile radius of the former Getters facility. The City of Lakewood draws its drinking water exclusively from Lake Erie at four intake points at least 3 miles from the former facility.

Groundwater flow directions are likely controlled by nonnative materials such as foundations and demolition debris; however, the general flow direction is north-to-northwest (PRC, 1992).

The exposed rocks of the Cleveland area are of sedimentary origin and range in age from late Devonian to Pleistocene. The exposed rocks fall into two general categories: indurated stratified rocks of late Devonian and early Carboniferous age, and unconsolidated surficial deposits of Pleistocene age. The surficial deposits consist primarily of Pleistocene glacial and lacustrine deposits and recent alluvium. Three Pleistocene deposits form a blanket over the bedrock - ranging in thickness from 0 to 440 feet. The indurated rocks crop out in beds and gorges of streams, quarries, and other excavations. The total thickness of Paleozoic strata exposed in this area is approximately 750 feet. These beds consist of shale, sandstone, and conglomerate of late Devonian, early Mississippian, and early Pennsylvanian age.

The soil association of the area surrounding the former Getters facility is called urban land. Urban lands consist of nearly level to gently sloping areas. These areas are predominantly covered with impervious surfaces, such as buildings, asphalt, and concrete and are common in business districts and industrial areas.

The former Getters facility is located approximately 1 mile south of Lake Erie and 2.5 miles east of the Rocky River, which drains into Lake Erie. The facility is not located in a 100-year flood plain. The average annual precipitation is 35.4 inches, net annual precipitation is 5.4 inches, and the intensity of a 1-year, 24-hour rainfall is 2 inches (PRC, 1992).

Release History

No evidence of known releases during Getters' operation of the facility was identified during the PA. UCAR personnel were not aware of any documented or supposed releases during Getters' operation of the facility. In addition, Getters did not supply TechLaw with release history information as requested in the PA/VSI Notification Letter, originally sent to Getters on June 9, 1998. During TechLaw's walk-through of the former Getters facility, no surface staining or other indications of releases were observed.

The nearest surface water body to the former Getters facility is Lake Erie, which is approximately 1 mile north of the facility. No evidence of known releases was identified by TechLaw. Therefore, it is unlikely that releases have occurred that may have directly impacted Lake Erie's surface-water quality. In addition, the current facility's sanitary system discharges to sewers where the combined wastewater is routed to Lakewood's POTW before it is discharges to Lake Erie. Therefore, it is unlikely that any release to a storm sewer at the facility would directly affect Lake Erie's surface-water quality.

There are residences close to the former Getters facility. These residences are to the north and west. Because the prevailing wind direction in this area is from the south, any release of hazardous constituents to the air would be directed towards these residences. However, evidence of releases to the air from Getters have been identified.

III. SOLID WASTE MANAGEMENT UNITS

This section presents descriptions of the SWMUs identified during the PA/VSI of the former Getters facility, and, in particular, as identified in Getters' response to the questionnaire. Photograph numbers correspond to those presented in the Photograph Log in Appendix A.

TABLE 1
SOLID WASTE MANAGEMENT UNITS

FORMER GETTERS CORPORATION OF AMERICA FACILITY
11901 MADISON AVENUE
CLEVELAND, OHIO

SWMU	DESCRIPTION	RELEASE POTENTIAL
SWMU 1	Former Container Storage Area	Low
SWMU 2	Former Container Storage Area	Low

SWMU 1 - Former Container Storage Area 1

Report Photograph Number: 1

Log Book Photograph Number: 3

Period of Operation: September 1987 to October 1988

Location: According to Getters' response to the questionnaire, this area is located adjacent to Building 73. Per discussions with UCAR employees and based on TechLaw's VSI, this area apparently abuts the southern, exterior wall of Building 73.

Physical Description: This area is currently covered with a concrete pad. It slopes to a drain at the garage door opening entering Buildings 72 and 73. No obvious surface cracks or stains were observed.

Getters' response to the questionnaire indicates that barium residue created as a by-product of Getters' furnacing operations (process by which barium carbonate oxide was converted to barium metal) was stored in this area prior to off-site shipment. All barium by-products were reportedly stored in Department of Transportation (DOT) approved, 55-gallon drums and barium by-products were sold as raw material to Barium & Chemicals Company of Steubenville, Ohio. Getters' furnacing operations (i.e., barium manufacturing) ceased in October 1988, when Getters' parent company, SAES S.P.A., Milan, Italy, started supplying material to Getters.

Wastes Managed: The unit reportedly managed 55-gallon drums of solid residue containing 54% barium, 23% aluminum and 23% oxide. Getters indicated that 30,000 pounds of this material was generated annually and sold as a raw material.

History of Releases: No evidence of known releases during Getters' operation of the facility was identified during the PA. UCAR personnel were not aware of any documented or supposed releases during Getters' operation of the facility. In addition, Getters did not supply release history information as requested in the PA/VSI Notification Letter, sent to Getters on June 9, 1998. During TechLaw's walk-through of the former Getters facility, no surface staining or other indications of releases were observed at this area.

Potential for Past/Present Release:

High ()
Moderate ()
Low (X)

Conclusions: Because no obvious surface cracks or staining were observed, and because this area is covered with a concrete pad that was not part of the reconstruction of Buildings 73 and 74 in 1995, no further action is recommended.

SWMU 2 - Former Container Storage Area 2

Report Photograph Number: 2

Log Book Photograph Number: 4

Period of Operation: September 1987 to December 1988

Location: According to Getters' response to the questionnaire, this area is a loading dock located at Building 5. Per discussions with UCAR employees and based on TechLaw's VSI, this area is located in the southern portion of Building 5.

Physical Description: This area is a loading dock located at the southern part of Building 5. Minor surface cracking exists in this area, but no surface staining was observed. However, it should be noted that there have been structural changes to the loading dock area since Getters ceased operating at the site.

Getters' response to the questionnaire indicates that area stored wastes generated from two dust collection devices associated with getter manufacturing processes. It is assumed that the dust collection was part of Getters' air pollution control measures associated with furnacing operations. Approximately 1,200 pounds of each residue were generated annually. In addition, this area stored spent degreasing fluid with oil residue generated from Getters' degreasing operations. Getters' degreasing operations generated 10,000 pounds of waste annually. This waste was stored in 55-gallon drums prior to off-site shipment.

Wastes Managed: The unit reportedly manage three waste streams generated at the facility. The waste streams were a solid residue containing 60% nickel, 20% barium and 20% aluminum, a second solid residue containing 50% barium and 50% nickel and spent degreaser solvent (1,1,1-trichloroethane). All three waste streams were reportedly shipped offsite for reclamation/reuse.

History of Releases: No evidence of known releases during Getters' operation of the facility was identified during the PA. UCAR personnel were not aware of any documented or supposed releases during Getters' operation of the facility. In addition, Getters did not supply release history information as requested in the PA/VSI Notification Letter, originally sent to Getters on June 9, 1998. During TechLaw's walk-through of the former Getters facility, no surface staining or other indications of releases were observed at this area.

Potential for Past/Present Release:

High ()
Moderate ()
Low(X)

Conclusions: Because only minor surface cracks and no surface staining were observed, which was likely not present at the time of operation, and there is no history of release, no further action is recommended.

IV. AREAS OF CONCERN

Based on TechLaw's PA, VSI assessment, visual site inspection of the former Getters site, and Getters' response to the questionnaire, no AOCs specific to Getters' operation at the site were identified.

V. CONCLUSIONS

Based on review of file materials, observations made during the VSI, and Getters' response to the questionnaire it appears that no further action or investigation under Corrective Action authorities are warranted with respect to the two SWMUs identified at this time.

VI. REFERENCES

1. November 11, 1980 EPA General Information Form No. 1, signed by D.E. Maguire, Vice President & General Manager, Union Carbide Corporation.
2. November 11, 1980 EPA Hazardous Waste Permit Application Form No. 3, signed by D.E. Maguire, Vice President & General Manager, Union Carbide Corporation.
3. April 6, 1981 Letter from Phillip A. Costanzo, Engineering Manager, Union Carbide Corporation Electronics Division, to RCRA Activities regarding barium residue management.
4. August 19, 1982 Letter from Karl J. Klepitsch, Jr., Chief, Waste Management Branch, U.S. EPA, Region V, to Phillip A. Costanzo, Engineering Manager, Union Carbide Corporation Electronics Division regarding withdrawal of Part A Hazardous Waste Permit Application.
5. March 23, 1983 Letter from Frank Kinnett, Vice President, International Insurance Company, The London Agency, Inc., to Regional Administrator, U.S. EPA, Region V regarding and enclosing Hazardous Waste Facility Certificate of Liability Insurance.
6. Undated Hazardous Waste Facility Certificate of Liability Insurance for Union Carbide Corporation Electronics Division signed by Fran Kinnett, Vice President, International Insurance Company, The London Agency, Inc.
7. July 29, 1983 Letter from Karl J. Klepitsch, Jr., Chief, Waste Management Branch, U.S. EPA, Region V, to Phillip A. Costanzo, Engineering Manager, Union Carbide Corporation Electronics Division regarding Union Carbide's meeting the requirements of Section 3005(e) of RCRA for Interim Status.
8. Undated EPA printout identifying the limit(s) of the process design capacities of the Union Carbide Facility.
9. July 31, 1984 Credit Memorandum from Atlas Metal to Pete Hostacky, Union Carbide Electronics Division indicating Union Carbide's sale of Nickel Barium Powder to Atlas Metal.
10. December 5, 1984 Letter from Albert Pavlik, Jr., Vice President, Barium and Chemicals, Inc., to Pete Hostacky, Union Carbide Electronics Division regarding Barium residue.
11. December 19, 1984 Letter from Phillip A. Costanzo, Engineering Manager, Union Carbide Corporation Electronics Division to Deborah J. Berg, District Inspector, Ohio EPA regarding barium residue and trichloroethane and attaching a correspondence from Albert Pavlik, Jr., Vice President, Barium and Chemicals, Inc., to Pete Hostacky, Union

- Carbide Electronics Division regarding Barium residue, dated December 5, 1984, and a Credit Memorandum from Atlas Metal to Pete Hostacky, Union Carbide Electronics Division indicating Union Carbide's sale of Nickel Barium Powder to Atlas Metal, dated July 31, 1984.
12. February 13, 1985 Letter from Debora Berg, District Inspector, Ohio EPA, to Phillip A. Costanzo, Engineering Manager, Union Carbide Corporation Electronics Division regarding follow-up to inspection and regulatory obligations and attaching a list of RCRA required activities and a copy of 40 CFR Part 122.6.
 13. March 19, 1985 Request for Change in Status to "Generator Accumulating Waste On-Site in Compliance with 40 CFR 262.34" signed by D.E. Maguire, Vice President, Union Carbide Electronics Division.
 14. March 22, 1985 Letter from Phillip A. Costanzo, Engineering Manager, Union Carbide Corporation Electronics Division to Deborah J. Berg, District Inspector, Ohio EPA regarding manner in which solvent waste will be managed.
 15. March 28, 1984 Interoffice Communication to Kevin O'Grady, DSHWM, Central Office, Ohio EPA, from Debby Berg, DSHWM, Northeast District Office, Ohio EPA regarding Union Carbide's management of solvent waste.
 16. November 22, 1985 Letter from Phillip A. Costanzo, Engineering Manager, Union Carbide Corporation Electronics Division to Deborah J. Berg, District Inspector, Ohio EPA regarding confirmation of understanding of issues discussed on November 22, 1985.
 17. December 12, 1985 Purchase Order from Barium and Chemicals to Tom Madden, Union Carbide regarding purchase of approximately 20 tons of Barium Aluminate.
 18. December 31, 1985 Purchase Order from Barium and Chemicals to Tom Madden, Union Carbide regarding purchase of 40 tons of Barium Metal Oxide.
 19. January 2, 1986 Letter from Deborah J. Berg, District Inspector, Ohio EPA, to Phillip A. Costanzo, Engineering Manager, Union Carbide Corporation Electronics Division confirming statements in letter from Phillip A. Costanzo to Debora Berg, dated November 22, 1986, are correct.
 20. January 31, 1986 Letter from David A. Stringham, Chief, Solid Waste Branch, U.S. EPA, Region V enclosing form for describing Union Carbide's efforts during 1985 to reduce the volume and toxicity of hazardous waste generated signed by W.A. Bagot, Vice President, Union Carbide Electronics Division, dated February 21, 1986, Purchase Order from Barium and Chemicals to Tom Madden, Union Carbide, dated December 12, 1985, and Purchase Order from Barium and Chemicals to Tom Madden, Union Carbide, dated February 10, 1986.
 21. February 13, 1986 Internal Correspondence from T.H. Madden, Union Carbide, to W.A. Bagot, Union Carbide regarding EPA required documents.

22. February 13, 1986 Letter from W.A. Bagot, Vice President, Union Carbide, to RCRA Activities, Region V regarding Hazardous Waste Permit Application U.S. EPA ID No. OHD00821470.
23. February 21, 1986 Waste Minimization Addendum to Generator Biennial of Annual Hazardous Waste Report for 1985 signed by W.A. Bagot, Vice President, Union Carbide Electronics Division.
24. Undated Letter from Karl J. Klepitsch, Jr., Chief, Waste Management Branch, U.S. EPA, Region V, to Phillip A. Costanzo, Engineering Manager, Union Carbide Corporation Electronics Division acknowledging receipt of Apr. 6, 1986, letter requesting the withdrawal of Union Carbide's Part A Hazardous Waste Permit Application.
25. July 29, 1986 Public Notice for Change in Status of Hazardous Waste Facility for Union Carbide.
26. August 31, 1987 Letter from Phillip A. Costanzo, Engineering Manager, Union Carbide Corporation Electronics Division to Deborah J. Berg, District Inspector, Ohio EPA regarding sale of "KEMET" business of Union Carbide to Getters Corporation.
27. January 18, 1988 Letter from Denise M. Haderski, Safety & Health, Getters Corporation, to U.S. EPA, Region V regarding sale of company and move of Getters Corporation to a new facility and confirming that a Notice of Hazardous Waste Activity Application will be filled out and a new EPA ID number will be assigned.
28. January 26, 1988 Conversation Record by Mary Villand for conversation with Debby Berg, OEPA regarding SQG status of Union Carbide.
29. May 17, 1988 Letter from Denise M. Handerski, Health & Safety Coordinator, Getters Corporation, to Francine Norling, U.S. EPA, Region V regarding withdrawal of Part A Application.
30. September 16, 1988 Letter from Karl E. Bremer, Chief, RCRA Permitting Branch, to Denise M. Haderski, Health & Safety Coordinator, Getters Corporation regarding approval of request for a change in status to "generator of hazardous waste."
31. February 7, 1989 Letter from Phillip A. Costanzo, Engineering Manager, Getters Corporation, to Francine Norling, U.S. EPA regarding request for new EPA ID No.
32. February 10, 1989 Letter from Arthur S. Kawatachi, Information Section, RCRA Program Management Branch, U.S. EPA, Region V, to Phil Costanzo regarding inactivating of EPA ID No. OHD00821470.
33. February 9, 1992 Preliminary Assessment/Visual Site Inspection report for UCAR Carbon Company, Inc., prepared by PRC Environmental Management, Inc. for U.S. EPA.

34. August 14, 1998, Facsimile transmittal from P.A. Costanzo, Getters Corporation of America, to Vincent Skreba, TechLaw, Inc., regarding and transmitting TechLaw's follow-up questionnaire with respect to the VSI of the former Getters facility.
35. Map of Union Carbide Electronics Division, Lakewood, Ohio.
36. July 9, 1998, VSI Field Logs, Mr. Rob Young and Mr. Vincent Skreba, TechLaw, Inc.

APPENDIX A

VISUAL SITE INSPECTION PHOTO LOG



Report Photograph No. 1
Logbook Photograph No.: 3
Date: 7/9/98

Time: 1250
Direction: West

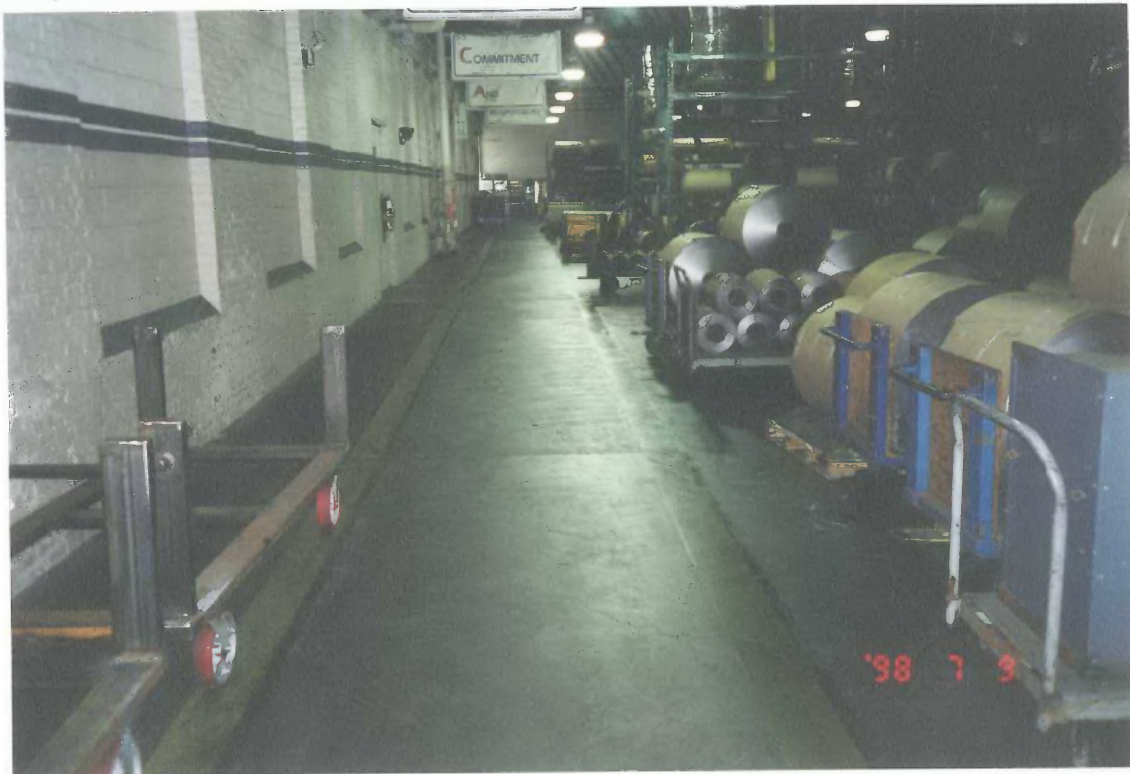
Description: View of the area identified as "Area A," the Former Container Storage Area (SWMU 1) in the facility layout (Appendix C). The south exterior wall of Building 73 is on the right in the photograph.



Report Photograph No. 2
Logbook Photograph No.: 4
Date: 7/9/98

Time: 1300
Direction: Northeast

Description: Overview of the outside of Buildings 4A and 5. The area outside these buildings, which includes the Former Container Storage Area 2 (SWMU 2), is paved with asphalt. The large hopper in the foreground is used to store scrap metal which is sold to a recycler.



Report Photograph No. 3
Logbook Photograph No.: 1
Date: 7/9/98

Time: 1230
Direction: North

Description: View of the concrete floor along the interior, western wall of building 5. This floor is typical of the concrete floors that currently exist in the former Getters facility.



Report Photograph No. 4
Logbook Photograph No.: 2
Date: 7/9/98

Time: 1245
Direction: West

Description: Overview of the exterior, north wall of Building 72/73. The brown/tan colored building is Building 72/73 and the red building to the south is Building 6A. Building 72/73 was rebuilt in approximately 1995.

APPENDIX B

VISUAL SITE INSPECTION FIELD NOTEBOOKS



"Rite in the Rain"
ALL-WEATHER WRITING PAPER

Name Rob Young
1200 N. 1st St.
Address 20 N. 1st St.
Suite 1260
Phone 312/345-8966
Project Green's Corporation

"Rite in the Rain" - a unique all-weather writing surface coated to shed water and to enhance the written image. Makes it possible to write sharp, legible field data in any kind of weather.

a product of

J. L. DARLING CORPORATION
TACOMA, WA 98424-1017 USA

(2)

1100: Meet w/ 40 REYE IN
OFFICE OF UCAR CARBON
COMPANY, INC (UC) MR.
WHITE, CHAIRMAN AND
SCARBIA JOIN IN THE
MEETING. 21 7/9/98

WELAGHTY & MURPHY CONDUCTED
AT SITE 201C & CONDUCTED
STUDY WHICH WAS PASSED
ON TO PRC IN 1991. PRC
CONDUCTED A PAYOFF OF
THE FACILITY IN 1991 --
OF THE GATTLER UNION
CARBIDE FACILITY.

1115: YOUNG INTRODUCES THE
PAYOFF TO UCAR REPRESENTATIVES

UCAR AND GATTLERS WERE
ONCE OWNED BY UNION
CARBIDE, WHILE UNION
CARBIDE OPERATED THE
TWO DIVISIONS (UCAR/
GATTLERS) BOTH OPERATED
7/9/98

(3)

7/9/98
ON-SITE, UCC DOES NOT
HAVE ANY INFORMATION ON
THE FORMER GATTLERS
PROCESSES AND WASTE
MANAGEMENT. UCC REPS.
CAN SHOW US THE AREA,
BUT CAN NOT SHOW US
WHERE FORMER UNITS WERE
LOCATED. UCC HAS SOME
GROUNDWATER CHANGES
• BUILDINGS 72-73 -
EXTENDED FOUNDATIONS, PUT
UP NEW STEEL, BUT
OVERALL PHYSICAL FOOTPRINT
THE SAME.

GATTLERS USED:

- BUILDINGS 72-73
 - LEGAL TO WEST OF BLDG 5
(FOR
BUILDING 4, 4A, 5A, 5,
3 (POSSIBLY), 3C (POSSIBLY),
20, 20A.
- 7/9/98

(4)

4A - MAINTENANCE SHOP

4 - CONTRACTOR SHOP

5A - FOREMAN OFFICES IN

SOUTH

5A - NORTH - MEETING / READING

FACILITIES

5 - NOW CAFETERIA WAS

JUST A WAREHOUSE

5 - IN MIDDLE - IN -

PROCESS STORAGE AREA

3A - NORTH - MAIN FRAME

COMPUTER - - NOT

OCCUPIED BY GETTERS

3A - SOUTH - WOMEN

RESTROOM (CAFETERIA AREA)

3 - SOUTH - AREA MAY

HAVE BEEN USED BY

GETTERS, BUT AT LEAST

NOT SINCE 1974.

20 - NOT SHOWN ON MAP -

JUST EAST OF 4A - -

WAS RASSED MORE

THAN 10 YEARS AGO.

20A - EXISTS - USED FOR

SHEDS MATERIAL

7/9/98

7/9/98

(5)

ALL BUILDINGS WERE SINGLE
STORY, WITH THE EXCEPTION
OF 4A.

GETTERS LEFT SITE IN 1989.
PILL CONDUCTED THE PA/USE
IN 1991.

ARE REFERENCES IN THE
GERALTY & MILLER REPORT
THAT WAS PROVIDED TO
PRC.

MR. FRYE DOES NOT REMEMBER
APPLYING (IN PART A) FOR
STORAGE UNITS IN THE
GETTERS CORPORATION.

MR. FRYE PROVIDES TWO
COPIES OF A SEWER MAP
FOR FACILITY.

7/9/98

6

7/9/98

VIRGIN OILS AND WASTE OILS
GENERATED IN MAINTENANCE
SHOP ARE STORED IN BLDG
4A, OVER SECONDARY
CONTAINMENT.

MR. FRYE DOES NOT PERFORM
ANY TESTS IN THE GETTERS
FURNACE.

QUESTIONS ON USE NOTIFICATION/
THE ONLY SAMPLING THAT HAS
BEEN CONDUCTED WAS PART
OF GYM INVESTIGATION
(CORPORATE PERMITS
FOR UNION CARBIDE IN
EARLY 1980S).

SITE HISTORY

KEMET WAS ON-SITE
SINCE AT LEAST PRIOR
TO EARLY 1970S. IN 1987,
KEMET WAS BOUGHT BY
TARAW CO. CALLED

7/9/98
KAT

7

7/9/98

LETTERS CO OF AMERICA.
IN 1989, LETTERS LEFT
THE SITE. KEMET WAS
A DIVISION OF UNION
CARBIDE PRIOR TO 1987.

EXACT PROPERTY TRANSFER
DATES NOT KNOWN BY
UNION CARBIDE. DISPOSITIONS

1210: METAL CANIS

1215: BROWN SITE TOWER

BROWN SITE TOWER IN BLDG 4A

4A - TILE FLOOR UNDERLIES
BY WOOD USED FOR
STORAGE OF EQUIP. BY
LOWEAL CONTRACTORS.
APPLIES TO BE UNDERLIES
BY BRICK FLOOR (UNDER
TILE/WOOD).

7/9/98
KAT

"(8)

7/7/98

BUILDING 4A - FLOOR IS
CONCRETE WITH NO
OBVIOUS CRACKS OR STAINS
HOUSES MAINTENANCE SHOP
OUTSIDE WALLS ARE
CONCRETE BLOCK/BRICK

BUILDING 4A HAS A
CONCRETE-FLOORED SECOND
STORY.

BUILDING 5 - CONCRETE FLOOR
W/ SOME MINOR CRACKS,
BUT NO STAINING OR
UR MATERIALS OBSERVED. ALSO,
NO DIPS/SUMPS OBSERVED
IN ANY FLOORS THIS FAR.

Photo #	DATE/TIME	DIR	DESCRIPTION
1	7/7/98/1230	N	VIEW OF FLOOR IN BUD 5, LOOKING N. ALONG THE W. WALL. FLOOR IS TYPICAL OF OTHER AREAS.

7/7/98

SOUTHERN PART OF BLDG 5A:

FIVE FLOOR OVER CONCRETE
WITH OFFICES NOW OCCUPYING
NORTH OF OFFICES ARE
WOMEN'S RESTROOMS AND
TRAINING ROOM-- THE TRAINING
ROOM IS ALSO FIVE FLOOR
W/ BRICK & CONC. CURVED
WALLS.

NORTHERN/CENTRAL PART OF
BUILDING 5: USED FOR
INSTRUCTION OF IN-PROCESS
MATERIALS.

LEAN-TO AREA ALONG WEST
OF BUD 5: NO LOWER
PRESENT-- NOW INMATE
TO CASERMA. WAS CALLED
BLDG "5B" AND WAS FORMERLY
KEMET/6000'S OFFICES.

7/9/98

10 (10)

7/9/98
BUILDINGS 72+73 - BUILT-OUT
BY NEW STRUCTURE

PHOTO	DATE	TIME	DIR	DESCRIPTION
2	7/9/98	1245	W	THE RED - COLORED BLDG IS BLDG 6A, BLDG 72/73 IS NEW RC/BUILT (POURING THIS MORNING) WEAR EXTENDED THE BUILDING AND RE-BUILT IT IN 1995. BLDG WAS EXTENDED TO THE WEST, PRODUCT TANK AREA SHOWN IN PHOTO.

BLDG 72 - CURRENTLY HOUSES PRODUCT MATERIALS SUCH AS SULFURIC ACID, SODIUM HYPOXIDE, ETC. IN LARGE ABOVE GROUND TANKS w/ 4' HILL DIKES. THE TANK DIKES ARE UNK w/ NEWLY POURED CONCRETE.

~~7/9/98~~

11

7/9/98

THE AREA WHERE NUMISMAQUE BLDG "A" MAY HAVE BEEN LOCATED IS NOW COVERED w/ CONCRETE. ~~7/9/98~~ 7/9/98
PND, IT SLIPS TO A DRAIN AS THE GARAGE DOOR OPENING ENTERING BLDGS 74/73. THE PAD IS UNK AND WAS A PART OF RECONSTRUCTION OF BLDGS 72/73.

PHOTO	DATE	TIME	DIR	DESCRIPTION
3	7/9/98	1250	W	VIEW OF AREA WHERE STRUCTURE AREA "A" MAY HAVE BEEN LOCATED, THE SOUTH WALL OF BLDG 73 IS ON THE RIGHT IN THE PHOTO. THE PHOTO IS TAKEN FROM THE INSIDE OF BLDG 72.

~~7/9/98~~

12 (12)

7/9/98
ALSO, THERE IS A GRATE
FOR STORMWATER RUNOFF
AROUND THE NORTH SIDE
OF AREA IN PHOTO, 3. IT
IS ~ 20' LONG, BY ABOUT
6" WIDE AND APPEARS TO
BE CONCRETE VINYL.

FOUND IN 20' DIRT IN
ASPHALT PARKING LOT, BLDG.
20 WAS RAISED SOMETIME
PRIOR TO 1974. BLDG. 20
HAD A PROCESSING BLDG.

BLDG 20A - IS PRESENT. IT
IS A STEEL STRUCTURE (ABOUT 20x
50') WITH A CONCRETE FLOOR.
SOME MINOR CRACKS IN FLOOR,
BUT NO STAINS OR LEAKS
PRESENT. MR. FINE THOUGHT
THIS BUILDING WAS USED BY
KONIG/GETTERS FOR
STORAGE

7/9/98
Lut

(13) 13

7/9/98
PHOTO 4
7/9/98 1300 NE
DESCRIPTION
VIEW OF SWATHORN
WARS (OUTSIDE) OF
BLDG 4A AND BLDG
5. THE AREA
IS COVERED W/
ASPHALT. THE
LARGE COPPER STORES
SUCKER METAL WHICH
IS SOLD FOR
RECYCLING.

1305: COMPLETE USE. AS WALKING
BACK TO OFFICE, THE FENCE
INDICATES THAT THE STREET
WATER COMBING W/ SANITARY
AND GOES TO WAREHOUSE POND.

ALSO, UCAL REPRESENTATIVE
PO NOT BE AWARE THAT ANY
GROUNDWATER IS USED FOR
DRINKING WATER APPLIES IN
THIS AREA.

7/9/98
Lut

14

7/9/98

1300: PAVING OUT OF THE MICHIGAN, YOUNG AND SKIDDA ASSURANCE A PAVEMENT TRANSFER. PAVEMENT EXTENDING THE NORTH CURB OF ROAD 72/13. IT IS USED FOR TRUCK-TO-TAIL TRANSFERS OF SODIUM HYDROXIDE, SODIUM HYPOCHLORITE, SULFURIC ACID (93%), NITRIC ACID, SULFURIC ACID (93%), AND SODIUM HYDROXIDE. THE AREA IS OUTSIDE THE BUILDING AND IS ABOUT 75x100' IN LENGTH AND IS DEEPER THAN THE CONCRETE PAD (ABOUT 6"). IT IS CONCRETE LINED (MATERIAL OF LINING NOT IDENTIFIED). A DRAIN RUNS DOWN THE CENTER OF THE UNIT. CONSTRUCTION OF THE DRAIN AND DISCHARGE POINT NOT IDENTIFIED. THIS AREA IS SHOWN IN PHOTO. 2.

1320: YOUNG AND SKIDDA LANE SITE.

7/9/98

nJones.

available:

ry Ledger

ry Ledger (Large)

ages

5-1/4 in.



84101 3

#84101

ains minimum of 50% recycled
40% is pre-consumer material
consumer material.

Wheeling, IL 60090

Made in U.S.A.

7.9.98

(1100)

VSI of former Getters facility, Cleveland,
Ohio (now UCAR Carbon)

Meeting with: Ed Frye, Environmental Affairs
Terry Wilkinson, Production Manager
Matt Scerba, Intern

Mentioned, but did not meet with
Dan White, Manager of
Admin. Services

The above are all UCAR Carbon
employees, not employees of Getters

7.9.98

7.9.98

(2)

Ed Fry stated that there was a

Site/ Groundwater Survey prepared by
Gardner + Miller (G+M) in 1991
for the entire facility

USI prepared by PRC in 1991 for
the entire facility (done in 1992)

Trey Wilkinson: Getters was once

part of Union Carbide, just like

UCAR was at the time (Subsidiary)

Getters was the KEMET division
of Union Carbide

Getters is now totally separate from
Union Carbide

V. S. S. S.
7.9.98

7.9.98

Ed Fry:

Did not know waste management
or storage information for Getters'
operations

Stated that there are no former
Getters employees currently working
for UCAR

UCAR's day-to-day interface with
Getters employees was minimal

Stated that the shaded areas of
our facility map represent where
Getters operated

V. S. S. S.
7.9.98

7.9.98

(4)

Ed Fry: described building used
event

Building 4A

- Maintenance storage area

Bldg 4

- Contractor space

Bldg 5 (Southern half)

- office areas for production
personnel

(Northern half)

- meeting + training rooms

(Very Northern part)

- Storage

Flex-Se Graphite is what UCAR
now makes

V. Smith
7.9.98

7.9.98

(5)

Bldg 3A (Northern part)

- Maintenance Computer
(Setters did not operate there)

(Southern)

- women's restrooms

(Most Southern)

- meeting room

Bldg 3 (Southern part)

- did not know if Setters
operated there

Bldg 2D

(just east of 4A)

- Setters used it, but it doesn't
exist anymore

Bldg 20A

Sheet metal

V. Smith
7.9.98

7.9.98

(16)

Bldg 4A - The only two store
bldg on-site, all others
are 1 store single storey

E. Fyne stated: PRC report was for
the entire site

G-M report references KENMET
operations

Rob Young asked Ed Fyne if he
knew of any sample, levers, etc.
where Getters would have stored
waste

Ed Fyne didn't think Getters would
have used any of these b/c they
used Barium mostly - which is
water reactive

V. Skel
7.9.98

7.9.98

(17)

Ed Fyne does not remember Getters
having any storage units, but thinks
that A, B, C, D, E on one map
may have been for KENMET

Ed Fyne: UGAR operates at Getters
old site

- The only storage is in the maintenance
shop

- new oil + grease

Ed Fyne: UGAR does not have a
copy of the G-M report
- PRC took the report

Ed Fyne had no knowledge of
UGAR

- KENMET did not use USTs

V. Skel
7.9.98

7.9.98

(8)

KEMET process would have used 55 gallon metal drums for any storage of barium aluminium sulfate

Ed Frye: GvM Survey did only outdoor sampling

- had no recollection of indoor sampling being done by GvM

Ed Frye: Getters would not have used SWAN Co (landfill) b/c it was closed while (prior to) Getters operated at the site.

Henry Wilkinson did not know specifics of purchase of facility by or from Getters - may have leased it.

7.9.98

~~V. J. [Signature]~~

(9)

12:10 muting wrap up + preparation for site walk through and photos

Side 4A (Currently where Contractors are located)

Ed Frye stated that it was set up now the same way as when Getters used it

- Contractor's storage room with a partition

Room has a door that leads to a hallway between 4 and 4A

Heading south to 4A

two storage rooms in the hallway about 10' x 12"

7.9.98

~~V. J. [Signature]~~

7.9.98

(10)

Bldg 4A Machine room

Concrete floor looked new

Ed King did not know how new it was

Brick walls on 3 sides w/ large windows

Other wall looked like sheet rock

This was the two story bldg

- Second story - Storage area

- insulation

- ping pong table

- brick walls

- cement floor

- "Clean"

7.9.98

7.9.98

(11)

Bldg 5 - Storage area (Southern part)

- cement floor

- brick walls

- high ceilings

Rob Young took 1st picture here

- picture is facing north

(Long, cement floor shot w/ flags above)

Bldg 5A (Southern part)

Foreman area

- tile floors w/ cubicles

(Northern part)

training room w/ brick walls & tile floors

Ed King did not know what

Gittus used this room for

- maybe engineering offices?

7.9.98

7.9.98

(12)

Telephone + drawing room in 5A

Getters did not use the telephone room, but may have used the drawing room.

Bldg 5B - 16-20' Admin bldg
Not there anymore

Outside

Rob Jones's second picture is outside of bldg 73

Bldg 73 was extended from its original length in late 1995 - early 1996

V. J. Smith
7.9.98

7.9.98

(13)

Bldg 72 now has sulfuric acid storage tanks in it

- transfer station outside

Ed Grise had no memory of storage drums outside of bldg 72/73

Bldg 72 - concrete floors w/ cement block + steel or aluminum walls

Third picture is what we think may be storage area "A"

- looking west outside of bldg 72/73

V. J. Smith
7.9.98

7.9.98

(14)

Bldg 20 - Moved in mid-1970s
Bldg was used by KEMET
processing ~ fuelcell operation
in bldg

Bldg 20A - Now used for Storage
concrete floors w/ steel &
aluminum walls

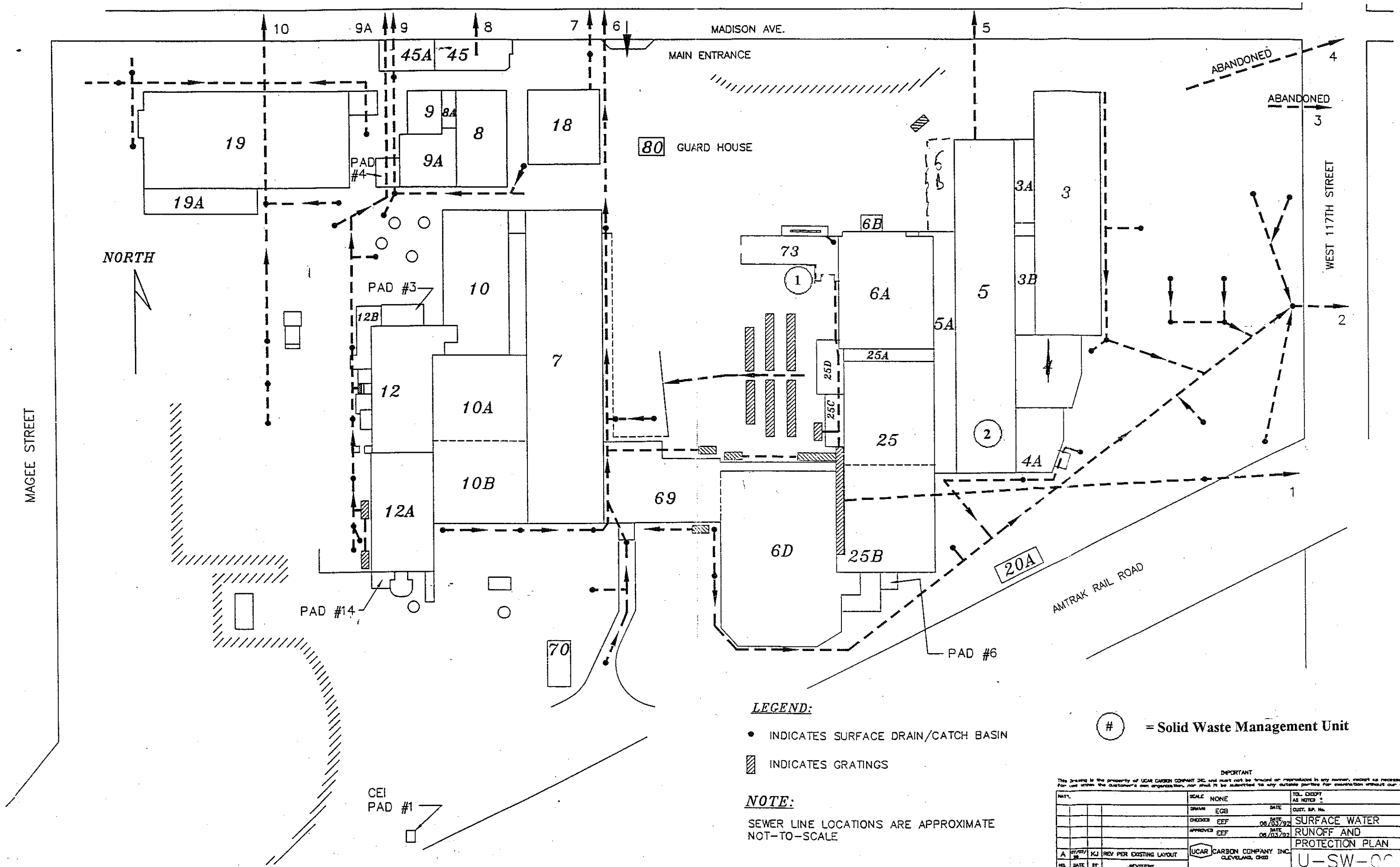
- Didn't know what Gethers
would have used this
for

For Surrounding area has municipal
water supply - no wells in area

Wrap-up @ 1305

V. J. Durkin
7.9.98

APPENDIX C
FACILITY LAYOUT



LEGEND:

- INDICATES SURFACE DRAIN/CATCH BASIN
- ▨ INDICATES GRATINGS

= Solid Waste Management Unit

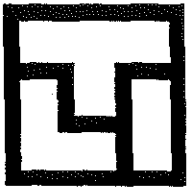
NOTE:

SEWER LINE LOCATIONS ARE APPROXIMATE
NOT-TO-SCALE

<small>THIS DRAWING IS THE PROPERTY OF UCAR CARBON COMPANY INC. AND MUST NOT BE LOANED OR REPRODUCED IN ANY MANNER, EXCEPT AS NECESSARY FOR USE WITHIN THE CUSTOMER'S OWN ORGANIZATION, NOR SHALL IT BE SUBMITTED TO ANY OUTSIDE PARTY FOR EXAMINATION WITHOUT OUR CONSENT.</small>				IMPORTANT	
DATE	SCALE	NONE	DATE	TOL. COPY	AS NOTED
	DRAWN	EEB		CUST. R.P. NO.	
	CHECKED	EEF	DATE		
	APPROVED	EEF	08/03/92		SURFACE WATER
					RUNOFF AND
					PROTECTION PLAN
UCAR CARBON COMPANY INC. CLEVELAND, OHIO				U-SW-00	
REV	DATE	BY	REVISION		
A	07/07/92	KJ	REV PER EXISTING LAYOUT		

APPENDIX D

CORRESPONDENCE AND QUESTIONNAIRE TO GETTERS CORPORATION OF
AMERICA



122 EAST 42ND STREET, SUITE 2200, NEW YORK, NY 10168

PHONE: (212) 949-4004
FAX: (212) 949-0726

TECHLAW INC.

July 21, 1998

Mr. Jim Breckel
Corporate Secretary, Treasurer
and Controller
Getters Corporation of America
5604 Valley Belt Road
Cleveland, Ohio 44131

RE: 7/9/98 - Visual Site Inspection
Former Getters Corporation of America
11901 Madison Avenue
Cleveland, Ohio 44101

Dear Mr. Breckel:

Pursuant to our discussion on July 7, 1998, regarding TechLaw's visual inspection of the above-referenced facility, I am writing to inform you that we have completed the inspection with the assistance of UCAR Carbon (UCAR) employees. This also confirms that a current Getters Corporation of America (Getters) representative was not present during our inspection.

Because Getters chose not to send a representative to the current UCAR facility to assist with the inspection, our report thus far is based on limited information gained through meeting with UCAR personnel that were employed at the site during the time Getters operated there. However, the UCAR personnel had limited knowledge regarding the processes and waste management practices conducted by Getters.

Enclosed is a questionnaire developed to gather information from Getters and to assist us in ensuring that the information in our report is accurate. We request that Getters complete this questionnaire and return it to the undersigned as soon as possible.

Your assistance with this matter is greatly appreciated. Please do not hesitate to call me at 212/949-4004, ext. 205 should you have any comments or questions.

Sincerely,

Vincent Skreba

Enclosure

cc: Gerald Phillips, U.S. EPA Region 5
William Wessley



**PRELIMINARY ASSESSMENT/VISUAL SITE INSPECTION
FOR
FORMER GETTERS CORPORATION OF AMERICA
11901 MADISON AVENUE
CLEVELAND, OHIO**

FOLLOW-UP QUESTIONNAIRE

1. For the time period that Getters operated at the above facility, describe the manufacturing practices used and wastes generated. Indicate the composition of each of the wastes that were generated and the process from which they were generated.

1. Furnacing operations to convert barium carbonate oxide and to barium metal:
By-product generated was barium residue (54% Ba, 23% Al, 23% O).
2. Dust collection from getter manufacturing: (60% Ni, 20% Ba, 20% Al).
3. Dust collection from getter manufacturing: (50% Ba, 50% Ni)
4. Degreasing operations: Trichloroethane 1.1.1 (TRI 1.1.1) with oil residue.

2. For the time period that Getters operated at the above facility, describe any solid waste management units (SWMUs), waste managed in these units, and the period of operation for each unit. In addition, please provide (either in text or on a figure) the location of all SWMUs.

1. Barium residue - 30,000 lbs annually - barium manufactured in Building No. 73
2. Dust collection (60% Ni, 20% Ba, 20% Al) - 1200 lbs annually - Getter Manufacturing Building No. 5.
3. Dust collection (50% Ba, 50% Ni) - 1200 lbs annually - Getter Manufacturing Building No. 5.
4. Degreasing TRI 1.1.1 with oil residue - 10,000 lbs annually - Getter Manufacturing Building No. 5.

3. For the time period that Getters operated at the above facility, identify any above ground and underground waste storage tanks, abandoned tanks, waste storage units for solid and hazardous wastes which fall under the 90-day exemption from RCRA, all waste handling areas and associated activities including loading zones, transfer areas, and waste accumulation areas. Please provide the location of the tanks/units and their period of operation.

No underground tanks for any items.

1. Barium residue was collected in a storage shed adjacent to Building No. 73 (the barium manufacturing building) and removed for shipment from that point.
2. Items 2 and 3 were removed from dust collection units and stored prior to shipment on Building No. 5 loading dock.
3. Spent degreasing fluid with oil residue was removed from degreaser and stored prior to shipment on Building No. 5 dock.

4. For the time period that Getters operated at the above facility, identify the location and provide information about underground storage tanks. Include descriptions of the contents, dates of operation, materials of construction, method and date of cleaning/closure, and any environmental samples collected from the tank area.

September 1, -1987 - December 31, 1988: No underground tanks. All barium by-products stored in 55 gallon drums - DOT approved for this type of material.

Waste TRI 1.1.1 was stored in original 55 gallon drums.

5. Provide a history or listing of all environmental permits that Getters operated under while at the facility.

US EPA ID#: OHD000821470

Note: Union Carbide - Getter Division was purchased by SAES Getters, Milan, Italy September 1, 1988. The facility continued to operate under the existing US EPA ID No. until leaving the property in December of 1988.

Barium manufacturing was discontinued in October of 1988 and was replaced by material supplied by our Parent Company, SAES S.p.A., Milan, Italy. Barium by-products were sold as a raw material to Barium & Chemicals Company of Steubenville, Ohio and waste TRI 1.1.1 was recycled back to Chemical Solvents Company of Cleveland, Ohio.